

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

**JOINT LETTER BRIEF RE:
DEFENDANTS' REQUESTS FOR
PRODUCTION FROM PLAINTIFFS'
DATA SOURCES**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Dear Judge Kang:

Pursuant to the Court's Standing Order for Discovery in Civil Cases, the Personal Injury Bellwether Plaintiffs and Defendants respectfully submit this joint letter brief regarding their outstanding dispute over Defendants' requests for the production of material from certain data sources used by Plaintiffs.

Pursuant to the Discovery Standing Order and Civil Local Rule 37-1, the Parties attest that they met and conferred by video conference, email, and correspondence on numerous occasions before filing this brief. On April 10, 2025 and again on April 29, 2025, lead counsel for the Parties involved in the dispute attended final conferrals. Because all lead counsel are not located in the geographic region of the Northern District of California or otherwise located within 100 miles of each other, they met via videoconference. Lead trial counsel have concluded that no agreement or further negotiated resolution can be reached. The parties will be prepared to address these disputes at the Court's earliest convenience.

Date: May 13, 2025

Respectfully submitted,

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Defendants' Position:

Defendants request an order requiring certain MDL Bellwether Plaintiffs to produce material from a subset of data sources that contain highly relevant information responsive to Defendants' discovery requests. Specifically, Defendants seek material from the data sources identified on Exhibit 1, which Defendants identified based on analysis from their ESI vendors, FTI, and IDS. The data sources include: other social media applications like Reddit, Discord, and Twitch; video games; and dating and wellness applications. The Court should order Plaintiffs to produce the material from these data sources because (1) they are relevant to the claims and defenses in these cases, and (2) the request for them was timely (with follow-up only necessary because Plaintiffs failed to produce from them already).

First, Plaintiffs are obligated to produce the material Defendants have requested under Rule 34. Defendants served a set of Requests for Production of Documents ("Requests") on Plaintiffs in May 2024. Defendants sought, among other things, material from the data sources identified on Exhibit 1. For example, numerous Requests relate to Plaintiffs' usage of "Online Media & Communication Services"—expressly including platforms like Reddit, Discord, Twitch, Signal, Telegram, Pinterest, and YikYak. *See Ex. 2, at RFPs 7, 9, 11, 12, 13, 15, 17, 24, 40, 43, 45, 65, 70, and 71.* The Requests also covered Meta and TikTok's request for data related to Snapchat use from Plaintiffs McNeal, S.K., and Mullen and YouTube use from Plaintiffs D'Orazio, McNeal, and Mullen. Defendants also requested documents related to the "date, time, [and] duration" of video games that Plaintiffs used, which encompasses the games listed on Exhibit 1. *See Ex. 2, at RFP 8.* In response, Plaintiffs agreed to produce all "non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties' meet and confer on [the] same."

Under Rule 34(b)(2)(C), Plaintiffs were required to affirmatively "state whether any responsive materials are being withheld on the basis of [an] objection," and did not state that any responsive material would be withheld. *Loop AI Labs Inc. v. Gatti*, 2016 WL 9132846 at *2 (N.D. Cal. May 6, 2016).

The sources identified on Exhibit 1 contain relevant information responsive to Defendants' Requests. Initially, certain data sources listed on Exhibit 1 were specifically identified in Defendants' Requests—e.g., the platforms listed above regarding "Online Media & Communication Services," and MyFitnessPal specifically listed in RFP 10. *See Ex. 2, at RFP 10.* In addition, several Plaintiffs have agreed to produce material from data sources listed on Exhibit 1. For example, Plaintiffs Craig, J.D., and Melton agreed to produce material from Twitter, and Plaintiffs J.D. and Clevenger agreed to produce material from Pinterest, but other Plaintiffs refuse to produce material from those platforms.

Moreover, the data sources at issue contain information that Judge Kuhl found is relevant to Plaintiffs' claims and ordered be produced—e.g., social media applications like Twitter, Twitch, Reddit, YikYak, and Discord; dating apps like Hinge, Tinder, Bumble, and Grindr; and entertainment/gaming apps like Hulu, Disney+, Candy Crush, Minecraft, and Roblox. *See JCCP March 19, 2025 Minute Order.* Plaintiffs contend that their purported "addiction" to Defendants' platforms caused their alleged injuries; yet Plaintiffs regularly use many other online services. Defendants are therefore entitled to information from those sources to determine whether Plaintiffs' use of them may have contributed to their alleged injuries. *See Benson v. Saban Cnty. Clinic*, 2023 U.S. Dist. LEXIS 166739, at *7 (C.D. Cal. Sept. 18, 2023) ("[W]hen a Plaintiff seeks damages for emotional distress, discovery into potential alternative causes of emotional distress is permissible."); *In re Apple Inc. Device Performance Litig.*, 2019 WL 3973752, at *1 (N.D. Cal. Aug. 2, 2019) (holding, "a plaintiff cannot bring suit and then

limit the defendant’s discovery that is targeted at the subject matter of the plaintiff’s claims”). Here, many of the sources are social media platforms that contain features similar to Defendants’ platforms; others are applications that forensic analysis has shown Plaintiffs spent a substantial amount of time using, including streaming services and gaming applications.¹

Plaintiffs’ assertion that producing the requested material is unduly burdensome also fails.² Because the material requested is relevant to Plaintiffs’ claims, any purported burden is proportional to the needs of the case. Many of the data sources at issue (including Pinterest, Yubo, and Tinder) also have a “Download Your Data” function. For those sources, Plaintiffs can obtain their data simply by requesting it through the platform. Moreover, any burden is of Plaintiffs’ own creation—they have been on notice that Defendants sought material from sources identified on Exhibit 1 for over a year but made no effort to collect data from them. Plaintiffs also represented to this Court that they would be “willing to accept the burden” of producing discrete data sources at the July 2024 discovery management conference. July 11, 2024 Hearing Tr., at 31:1-23. Plaintiffs cannot now refuse to produce relevant material based upon a burden they created and voluntarily accepted.

Second, Defendants’ request for material from these data sources was timely. Defendants initially requested material from sources identified on Exhibit 1 over a year ago. Ex. 2. Plaintiffs agreed to produce all “non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties’ meet and confer on the same.” Ex. 3. On June 19, 2024, Plaintiffs provided Defendants an initial list of “data sources that Plaintiffs have identified as potentially containing relevant information based on their investigations to date. In addition, to the extent additional data sources are identified, collected, and searched beyond those identified in the attached disclosures, and responsive information is found in such sources, Plaintiffs agree to provide Defendants with a list of such sources.” Yet Plaintiffs did not identify additional sources and now refuse to make productions from the ones Defendants identified following their analysis of the data provided by Plaintiffs from their devices.

Following the discovery management conference in July 2024, the Court issued DMO 8 requiring the Parties to “meet and confer to determine which data sets are to be produced from the PI Plaintiffs devices” and “encouraged” the Parties to “have their respective technical consultants or experts participate to facilitate discussion.” DMO 8 at 6. The Court also ordered Plaintiffs to “provide a full list and chart to the Defendants of all the applications which are currently on the relevant Bellwether PI Plaintiffs’ devices,” and noted that the production of “forensic data” would be an “iterative process.” *Id.* Thereafter, Plaintiffs provided a list of applications on their devices but did not state that they would refuse to produce material from any of the applications listed as Rule 34(b)(2)(C) requires.

On September 19, 2024, the Parties and their ESI vendors met “to discuss the categories and location of data sought from Main Devices, and the requested format for production of the agreed upon data.”

¹ For the pornographic data sources, Defendants seek only information about duration of usage.

² The list of data sources Defendants identified is also tailored. Although Plaintiffs’ devices have dozens of applications (and some have hundreds), Defendants have limited their requests to a narrow subset of data sources that are most likely to contain relevant information.

ECF No. 1166 at 6. During those discussions, Plaintiffs claimed they would produce data from “relevant applications” but expressed concern about having to produce material from every application on each Plaintiff’s devices. In order to facilitate Plaintiffs’ production of device data, the Court entered the Parties’ Joint Stipulation re Device Usage Data Production Protocol on October 28, 2024. Pursuant to the Protocol, Plaintiffs provided FTI and IDS redacted images of Plaintiffs’ devices on November 5, 2024. Between November 2024 and February 2025, FTI and IDS analyzed the device images in connection with Plaintiffs’ depositions, and identified additional data sources not previously disclosed by Plaintiffs or their vendor (CFS) likely to contain relevant information. After FTI and IDS concluded their analysis, Defendants sought confirmation that Plaintiffs would produce information from the data sources on Exhibit 1. Despite being aware of Defendants’ Requests for almost a year, the Court’s order for the production of ESI to be an “iterative process,” and the Parties’ agreement that the Parties’ respective forensic imaging vendors would assist with identifying relevant applications, Plaintiffs now refuse to produce *any* additional material based upon claimed untimeliness. But that claim is false. Defendants first sought the material now at issue in May 2024 and have attempted to engage in the “iterative process” for the production of relevant information contemplated by the Court since then. Plaintiffs, in contrast, appear to argue that their obligation to identify additional data sources ended on June 19, 2024 when they provided an initial list “potentially containing relevant information based on their investigations to date.” Plaintiffs’ position is inconsistent with Rule 34 and the Court’s orders regarding discovery and attempts to take advantage of their own lack of diligence in identifying patently relevant sources.

Defendants seek production of highly relevant material that Defendants requested in a timely manner and that Plaintiffs should have already identified and produced. Accordingly, the Court should order Plaintiffs to produce material from the sources identified on Exhibit 1.

Plaintiffs’ Position:

Since fact discovery opened in this case over a year ago, Plaintiffs have made extensive ESI productions from a wide range of sources, touching upon many sensitive personal areas. These productions followed extensive negotiations in light of Defendants’ all-encompassing requests for production. Despite all this work, Defendants waited until the week before the close of fact discovery to request that nine personal injury bellwether Plaintiffs³ collect and produce ESI from nearly **200** new sources that were not part of the Parties’ prior agreements. Defendants’ only proffered basis for these requests is that the forensic images of Plaintiffs’ relevant devices (which Defendants have had since November 2024) “reflect the use” of certain applications or websites, regardless of those sources’ conceivable relevance to this case. The Court should deny this eleventh-hour fishing expedition. First, Defendants have had every opportunity and more than sufficient information to identify any ESI sources that they believed warranted collection. If they truly viewed these additional sources as necessary, they should have (and could have) raised them months ago. Second, these belated requests for additional ESI discovery are unreasonable, irrelevant, and disproportionate to the needs of these cases, and Defendants have refused to substantiate this significant burden despite repeated requests from Plaintiffs.

³ Defendants requested these accounts be collected for Plaintiffs Craig, Melton, and Smith on March 26; D’Orazio, Guzman, and McNeal on March 27; and J.D., Clevenger, and Mullen on March 28. Defendants did not make similar requests of Plaintiff S.K.

Defendants cannot justify their delay in requesting this new information. The Northern District's *Guidelines for the Discovery of Electronically Stored Information* "emphasize[] the particular importance of cooperative exchanges of information at the earliest possible stage of discovery." Consistent with that guidance, this Court has required the Parties to engage in an iterative, cooperative process for ESI production that balanced the discovery needs of this litigation with the "strong privacy interests implicated by accessing individuals' cellphones." ECF 1025 (DMO No. 8) at 5. In the spirit of that process, Plaintiffs promptly began providing Defendants with information regarding their ESI in the summer of 2024. On June 19, 2024, Plaintiffs disclosed to Defendants the sources they were collecting and searching for responsive ESI. In compliance with the Court's order denying Defendants' request for full forensic imaging of Plaintiffs' electronic devices, *see id.* at 6, on July 19, 2024, Plaintiffs identified all applications that were downloaded on their relevant devices. In the subsequent months, and with the benefit of this information, the Parties engaged in many conferrals regarding the scope of Defendants' requests, including extensive negotiations regarding search terms. Defendants did not raise any concerns regarding the sources that Plaintiffs were collecting and searching for responsive ESI, nor did they request the collection of additional sources.

In response to Defendants' RFPs, Plaintiffs produced hundreds of thousands of documents collected from physical and electronic sources, as well as voluminous medical records and related authorizations. Plaintiffs substantially completed their document productions in October and November 2024, and, following extensive negotiations, produced full forensic images of their relevant devices (the purported impetus for Defendants' recent requests) in November 2024. Since then, Defendants have deposed every Plaintiff and numerous third parties. Simply put, for many months Defendants have had ample information from which they could identify accounts or applications that they contend may contain responsive ESI; they chose not to. The notion that further collection is now required—after the close of fact discovery—is both unfounded and inconsistent with the cooperative process directed by the Court.

Defendants' attempted reliance on several of the RFPs they served in May 2024 is a red herring. As discussed above, the Parties negotiated productions in response to those requests (and others) over the period of several months last year. Those negotiations touched on many of the RFPs to which Defendants now point. For example, the Parties agreed to limit RFP 6, which sought all documents relating to Plaintiffs' use of streaming services, to profiles or accounts that belong to Plaintiffs for their exclusive use, and only for relevant devices that are not available for forensic imaging. In negotiating search terms related to Defendants' RFPs, the Parties agreed that search terms related to pornography would only be run where the circumstances in individual cases justified doing so. Defendants did not even attempt to explain the departure from the Parties' previous agreements during conferrals, and they again fail to do so in their portion of this brief. Until now, Defendants never raised an issue with Plaintiffs' responses to the RFPs supposedly at issue. It is patently unfair for Defendants to have sat on their hands for nearly all of fact discovery, then rush to Court at the eleventh hour seeking the production of hundreds of irrelevant sources, seemingly abandoning the hard-fought compromises that the Parties reached during fact discovery.

Defendants' belated requests are plainly overbroad and unduly burdensome. The overbreadth of Defendants' requests belies any proportionality of these requests. Defendants' requests encompass accounts or applications that have no apparent connection to the issues in this litigation, such as

music streaming services and the language-learning app Duolingo. Defendants have been either unable or unwilling to provide any explanation for these plainly overbroad requests. Instead, they simply repeated that because Plaintiffs may have downloaded these apps or visited these websites, they “likely contain” responsive ESI. As this Court acknowledged in denying Defendants’ request for full forensic imaging of Plaintiffs’ electronic devices, this litigation does not give Defendants license to engage in “a significant privacy intrusion without a clear demonstration that such extensive discovery is necessary for resolving the central issues of the case.” *Id.* at 5. To justify the relevance of this discovery, Defendants could have asked Plaintiffs about these apps and websites during their depositions. They did not, and their portion of this brief does not point to any record evidence substantiating that connection for *any* Plaintiff. Given the extensive discovery that Defendants have obtained from Plaintiffs over the course of the last year, Defendants should be able to provide adequate justification for these requests. Because they cannot, their requests should be denied as irrelevant and disproportionate to the needs of these cases.

In addition, Defendants’ requests would place an undue burden on Plaintiffs and extend fact discovery well beyond the deadline. Practically speaking, Defendants’ failure to make these requests in a timely fashion will result in significant delays and incur unnecessary expense. Each of the additional sources would require Plaintiffs to individually investigate the process for collection from that third-party app or website. Those methods of collection include identifying whether accounts exist and are accessible by Plaintiffs, accessing those accounts, determining the process to request whatever data may be available, and requesting said data in whatever form it is available. The timeline for retrieval of that data will vary from source to source. Spotify, for example, allows users to request up to three different packages of data, and the preparation time *alone* for that data ranges from five to thirty days. *See Account Privacy*, Spotify (accessed May 8, 2025), <https://www.spotify.com/us/account/privacy/>. Such timelines do not include the significant amount of time required to process, ingest, and review the materials, all of which would add months of time and significant expense. All this, simply for the search and production of ESI that will contain minimal, at best, probative value.

Finally, Judge Kuhl’s order in the JCCP does not control here. That litigation, unlike this MDL, has a second phase of bellwether fact discovery. As has become apparent in the JCCP, producing information from the websites or apps ordered by Judge Kuhl is incredibly burdensome and will take *months* to complete. It would be inappropriate to require Plaintiffs here to expend the same time and resources here given that fact discovery is closed. In addition, Defendants raised this issue with the JCCP court on March 17 for discussion at the March 19 status conference, ensuring judicial resolution of the matter well before the close of fact discovery there. Here, by contrast, Defendants did not even serve their expansive requests on Plaintiffs until days before the close of fact discovery. The Court should not reward Defendants for their lack of diligence.

* * *

Fact discovery has ended. Even if these unreasonable requests were ever appropriate, which they would not have been, the time to make them has long passed. Plaintiffs should not be forced to assume this enormous burden and divert time and resources that should be devoted to expert discovery, trial bellwether selection, and preparation for trial to these overbroad, irrelevant, and belated requests.

EXHIBIT 1

	SOURCE
CLEVENGER	Twitter
	Twitch
	VSCO
	Reddit
	Houseparty
	Kik
	Yolo
	YikYak
	Spinnr
	Hinge
	Tinder
	Bumble
	Naughtychat
	Daisie
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	Grindr
	Character.AI
	Spychat AI
	OnlyFans
	Youmetalks
	PepHop
D'ORAZIO	YouTube
	BeReal
	Pinterest
	LinkedIn
	Twitter
	ZeeMee
	Flickr
	VSCO
	Vlinder.avatar.maker
	Avatar2016factory
	Com.ctomas.vitek
	DuoLingo
	Candy Crush
	Minecraft
	Netflix
	Magicv.AirBrush
	Game Pack
	Gametime
	Health
	Journal
	Notes
	Spotify
J.D.	MyFitnessPal
	Roblox
	Netflix
	Hulu
	Wattpad
MCNEAL	YouTube
	Snapchat
	Pinterest
	Tinder
	Zoe
	DuoLingo
	LinkedIn
	Twitter
	Oakgames 2248 Number Puzzle
	Figgerits
	FunRun3
	Bricks n Balls
	Nextdoor
	Roblox

	Discord
	Game Pigeon
	GameStop
	GameWise
	Melsoft Games/Family Island Farm
	XBox
MELTON	Fishbrain
	Pinterest
	Discord
	Twitch
	Reddit
	Bumble
	Kik
	GamePigeon
	Idle Miner
	Pixel Car Racer
	SubwaySurfers
	pornhub
	OnlyFans
	xvideos
	18andabused
	youporn
	sexmeetusa
	email.localhussies
	VSCO
	Combatmaster
	Mortal Combat
	Musi
	Twitter
	Omegle
MULLEN	BeReal
	Purple Buddy
	Twitter
	Pinterest
	VSCO
	Reddit
	Hinge
	GroupMe
	YouTube
	PeriodTracker
	Health
	Netflix
	Hulu
	Disney+
	Eating Well
	Mayo Clinic
	WebMD

	Peacock
	Flickr
	Buzz
	Notes
	Life360.SafetyMap
SMITH	Yubo
	Wink
	Meet
	GroupMe
	Badoo
	MyFitnessPal
	I am
	Productive
	SNOW
	Peacock
	Facetune2
	GamePigeon
	Roblox
M.G.	Minecraft
	Pinterest
	Xbox Live
	VSCO
	Intermittent Fasting Tracker
	Nike Run Club – Running Coach
	Pedometer++
	Chef Umami
	Water Sort Puzzle
	X2 Blocks – 2048 Number Game
	LifeOmic
	Apollo for Reddit
	Skype
	Be a Bartender!

EXHIBIT 2

1 [Counsel Listed on Signature Pages]

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

9

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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

13

THIS DOCUMENT RELATES TO:

MDL No. 3047

14

Laurel Clevenger

**DEFENDANTS' FIRST REQUESTS FOR
PRODUCTION TO PLAINTIFF LAUREL
CLEVINGER**

15

Member Case No.: 4:22-cv-06457

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PROPOUNDING PARTY: Defendants listed below

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RESPONDING PARTY: Plaintiff Laurel Clevenger

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SET: 1

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DATE OF SERVICE: May 1, 2024

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1 **DEFENDANTS' FIRST REQUESTS FOR PRODUCTION TO PLAINTIFF LAUREL**
 2 **CLEVENCER**

3 Defendants Meta Platforms, Inc., Instagram, LLC, Facebook Payments, Inc., Siculus, Inc.,
 4 Facebook Operations, LLC, Snap Inc., ByteDance, LTD, ByteDance, Inc, TikTok, Ltd., TikTok,
 5 LLC, and TikTok, Inc., pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby serve
 6 the following First Requests for Production to Plaintiff Laurel Clevenger. These Requests are
 7 continuing, and Plaintiff is required to seasonably supplement her responses.

8 **DEFINITIONS**

9 The following definitions, which have been included in alphabetical order for ease of
 10 reference, apply to each of the following instructions, and requests for production:

11 1. The term “CHALLENGE” is described in section IV(A)(6) of Plaintiffs’ Amended
 12 Master Complaint (Personal Injury).

13 2. The term “COMPLAINT” refers to the operative complaint, INCLUDING the most
 14 recent Master Complaint and most recent Short Form Complaint, filed by YOU against the
 15 DEFENDANTS in the LAWSUIT.

16 3. The term “CSAM” refers to child sexual abuse materials, (i.e. any visual depiction
 17 of sexually explicit conduct involving a person less than 18 years old). For the avoidance of
 18 doubt, DEFENDANTS expressly do not request, to the extent it exists, copies of any CSAM sent or
 19 received by YOU.

20 4. The term DEFENDANT means any of the parties against whom YOU have brought
 21 a claim in YOUR COMPLAINT.

22 5. The term “DEVICE” means each and every smartphone, tablet, video game console,
 23 computer, laptop computer, desktop computer, server, and any and all similar tangible object,
 24 device, or box that includes an operating system that can hold, store, receive, and transmit data.

25 6. The term “DOCUMENT” refers to each and every writing or record, however
 26 produced or reproduced, whether draft or final, original or reproduction, paper or electronic,
 27 signed or unsigned, that is in YOUR possession, custody, or control or to which YOU otherwise

1 have access, regardless of where located (e.g. paper, DEVICE, compact disk, computer disk and
 2 drive, etc.), INCLUDING any communication (INCLUDING all forms of information
 3 transference written, oral or electronic, INCLUDING meetings, conferences, conversations,
 4 discussions, proposals, solicitations, interviews, correspondence, text messages, all other
 5 electronic messages and notes, as well as memoranda and records of communications),
 6 correspondence, emails, electronic information, data, letters, cellphone data, screenshots, screen
 7 time data or information, location information, search histories, journals, photographs, tape
 8 recordings, video recordings, movies, other data compilations from which information can be
 9 obtained, all materials similar to any of the foregoing, and all other DOCUMENTS and things
 10 subject to production under Rule 34 of the Federal Rules of Civil Procedure. All copies and
 11 versions of any document that contain any notation, erasure, obliteration, marking, or writing of
 12 any kind different from the original shall be treated as an original document.

13 7. The term “FAMILY” refers to YOUR parents, legal guardians, caretakers, siblings,
 14 aunts, uncles, cousins, grandparents, nieces, and/or nephews.

15 8. The term “HEALTHCARE PROFESSIONAL” refers to any practitioner of the
 16 healing arts, INCLUDING any: psychiatrist; psychologist; psychotherapist; counselor; therapist;
 17 other mental health professional; physician (whether medical doctor, homeopathic, osteopathic,
 18 chiropractic, or otherwise); physician assistant; nurse; nurse practitioner; nursing assistant;
 19 physical, occupational, or rehabilitative therapist; social worker; nutritionist; dietician; or
 20 alternative healthcare practitioner.

21 9. The term “HOUSEHOLD” refers, individually and collectively, to each and every
 22 person that lives with YOU, that YOU support financially, that supports YOU financially, that
 23 lists YOUR permanent address as their permanent address on their driver’s license or for tax
 24 purposes, or that YOU consider part of YOUR nuclear family, including individuals who formerly
 25 met this definition during any part of the RELEVANT TIME PERIOD.

26 10. The terms “INCLUDING” or “INCLUDES” shall be interpreted without limitation
 27 so as to identify a non-exhaustive set of examples (i.e., “INCLUDING”) and to expand the

1 meaning or interpretation of a term or question rather than limit any request to the specified
2 examples.

3 11. The term “INDIVIDUALIZED EDUCATION PROGRAM” means a plan or
4 program developed pursuant to federal and/or state special education law to ensure that a child
5 with a disability who attends an elementary or secondary educational institution receives
6 appropriate education, instruction, and related services.

7 12. The term “INTERNET ACCESS PROVIDER” means any provider of access to the
8 internet whether at home, school, work, or public, INCLUDING: broadband internet service
9 providers (e.g., by cable, fiber-optic, or digital subscriber line); wireless service providers (e.g.,
10 cellular or satellite); and public networks (e.g., public WiFi or hotspots).

11 13. The term “LAWSUIT” refers to the above-captioned matter.

12 14. The term “MENTAL HEALTH CONDITION” refers to any disease, condition or
13 disorder, whether organic or inorganic, customarily within the scope of treatment of psychiatrists,
14 psychologists, psychotherapists, counselors, social workers, or other mental health professionals,
15 INCLUDING: anxiety; attention deficit disorder (with or without hyperactivity); autism spectrum
16 disorder; behavioral or conduct disorders; bipolar disorder; depression or depressive disorder;
17 eating disorders; disassociation or dissociative disorders; emotional disorders; mood disorders;
18 obsessive compulsive disorder; paranoia; personality disorders; post-traumatic stress disorder;
19 schizophrenia; self-harming behaviors; sleeping disorders; or suicidal thoughts or actions.

20 15. The term “ONLINE MEDIA & COMMUNICATIONS SERVICE” means any
21 websites or applications that enable users to create, share and view content, participate in social
22 networking, send and receive messages, or interact with one another in any form (e.g., text,
23 images, audio, videos, etc.). This INCLUDES but is not limited to Facebook, Instagram,
24 Snapchat, TikTok, YouTube, YouTube Kids, Band, Discord, Facebook Facetime, FamilyApp,
25 GameChanger, GroupMe, Heia, iMessage, Kik, LINE, Microsoft Teams, Oovoo, Pinterest,
26 Reddit, Signal, Slack, Sportlyzer, SportsEngine, sportsYou, StackSports, Teamer, TeamsReach,
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1 TeamsApp, TeamSnap, Telegram, Threads, Tumblr, Viber, WeChat, X (formerly known as
2 Twitter), Yik Yak, and Zoom.

3 16. The term “RELATING TO” shall refer to constituting, comprising, concerning,
4 containing, reflecting, setting forth, showing, disclosing, describing, explaining, summarizing,
5 referring to, supporting, contradicting, proving, disproving, or tending to prove or disprove,
6 directly or indirectly, in whole or in part, and should be given the broadest possible scope
7 consistent with the discovery rules contained in the Federal Rules of Civil Procedure. These terms
8 should be construed to apply not only to the events to which they refer directly, but also to all
9 meetings, discussions, contacts, and other communications concerning those events, either with or
10 between YOU and third persons.

11 17. The term “RELEVANT TIME PERIOD” refers to the period from the time you
12 turned seven (7) years old to April 1, 2024.

13 18. The term “STREAMING SERVICE” means a service that delivers video, music, or
14 other media over the internet or satellite to a computer, television, or mobile device, INCLUDING
15 Netflix, Amazon Prime, Hulu, Disney+, Max (F/K/A HBO), Apple TV+, Peacock, Paramount+,
16 Spotify, Apple Podcasts, Apple Music, Sirius XM, Audible, and Libby.

17 19. The terms “YOU,” “YOUR,” “YOURSELF,” and “PLAINTIFF” refer to the
18 answering named Plaintiff unless this LAWSUIT was filed on behalf of a minor or decedent, in
19 which case “YOU,” “YOUR,” “YOURSELF,” and “PLAINTIFF” shall refer to such minor or
20 decedent.

21 20. In these discovery requests, whether or not these defined words are capitalized, the
22 singular shall include the plural, and the plural shall include the singular; “AND” shall include
23 “OR” and “OR” shall include “AND;” “ANY” shall include “ALL” and “ALL” shall include
24 “ANY.”

INSTRUCTIONS

A. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, these document requests shall be deemed to be continuing, so as to require YOU to supplement YOUR responses as soon as further relevant information or DOCUMENTS are obtained.

B. If YOU object to or otherwise decline to comply with any portion of any request, YOU shall provide all information requested by that portion of the request to which YOU do not object or with which YOU do not decline to comply. If YOU object to a request on the ground that the request is too broad, YOU shall provide all information that YOU concede is relevant. If YOU object to a request on the ground that to provide the requested discovery would constitute an undue burden, YOU shall provide all requested discovery that can be supplied without undertaking what YOU claim is an undue burden. DEFENDANTS hereby agree that any such partial production AND answer shall not be deemed to be a waiver of YOUR objection to the parts of the request to which answers have not been made. As to those portions of any request to which YOU object or with which YOU decline to comply, YOU shall state the reason or reasons for YOUR objection or declination.

C. Each request for production extends to all DOCUMENTS in YOUR possession, custody, or control, or the possession, custody, or control of anyone acting on YOUR behalf.

REQUESTS FOR PRODUCTION

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendants request that YOU produce the DOCUMENTS requested below to counsel for Defendants listed below at Covington & Burling LLC, 1999 Avenue of the Stars, Los Angeles, California, 90067-4643 within thirty (30) days of service of these Requests.

1. All legal DOCUMENTS RELATING TO any marriage/civil union/partnership YOU or YOUR parent(s), legal guardian(s), or caretaker(s) have ever had, INCLUDING any DOCUMENTS RELATING TO divorce, separation, alleged adultery, or alleged domestic abuse.

- 1 2. All DOCUMENTS RELATING TO any mental illness suffered by or mental illness
- 2 diagnoses of any FAMILY member, INCLUDING the relationship of the FAMILY member
- 3 to YOU, the mental illness, any treatment received, and the effect the FAMILY member's
- 4 mental illness has had on YOU.
- 5 3. All electronic information or data created or maintained by YOUR INTERNET ACCESS
- 6 PROVIDERS RELATING TO YOUR internet usage or activity. In lieu of obtaining this
- 7 information YOURSELF, YOU may execute the attached authorization to permit
- 8 DEFENDANTS to seek from YOUR INTERNET ACCESS PROVIDERS all electronic
- 9 information or data they have created and/or maintained RELATING TO YOUR internet
- 10 usage or activity.
- 11 4. All DOCUMENTS RELATING TO screen time data on all HOUSEHOLD DEVICES used
- 12 by YOU during the RELEVANT TIME PERIOD. For example, this can be accessed on an
- 13 iPhone by opening the Settings App and selecting "Screen Time." The response should
- 14 include: "All Website and App Activity," by week, for each week of the RELEVANT
- 15 TIME PERIOD; any "App Limits" imposed on each and every DEVICE in YOUR
- 16 possession; any "Communication Limits" or "Communication Safety" parameters opted
- 17 into by any member of YOUR HOUSEHOLD on each and every one of their DEVICES in
- 18 YOUR possession; scheduled "Downtime"; apps that are "Always Allowed"; "Content &
- 19 Privacy Restrictions"; and "Lock Screen Time Settings," as indicated on each and every
- 20 DEVICE in YOUR possession for the RELEVANT TIME PERIOD.
- 21 5. DOCUMENTS sufficient to identify all websites, apps, or platforms YOU have used to
- 22 access STREAMING SERVICES.
- 23 6. All DOCUMENTS RELATING TO YOUR use of STREAMING SERVICES,
- 24 INCLUDING DOCUMENTS and any data RELATING TO the duration and frequency of
- 25 use of each service, videos watched, times watched, and dates watched since YOU first had
- 26 regular access to electronics to April 1, 2024.

7. DOCUMENTS sufficient to show the names of all video games, as well as the websites, ONLINE MEDIA & COMMUNICATIONS SERVICES, platforms, game consoles, and systems YOU have used to play or otherwise engage with video games.
 8. All DOCUMENTS RELATING TO YOUR use of video games, INCLUDING DOCUMENTS RELATING TO the date, time, duration, frequency, gaming DEVICE, and games played for every gaming DEVICE YOU used since YOU first had regular access to electronics (e.g. Xbox, Nintendo, PlayStation, computer, video games accessed on phones, mobile devices, or tablets) to April 1, 2024.
 9. All DOCUMENTS RELATING TO YOUR Apple App Store or Google Play Store purchases, downloads, or the removal of ONLINE MEDIA & COMMUNICATIONS SERVICE from YOUR DEVICES during the RELEVANT TIME PERIOD.
 10. All DOCUMENTS RELATING TO YOUR use of health, dieting, wellness, or fitness applications (INCLUDING BeachBody, My Fitness Pal, NOOM, SWEAT, Peloton, ClassPass, SoulCycle, Barry's, Orange Theory) or trackers (INCLUDING Apple Health, Apple Watch, FitBit, Garmin, My Fitness Pal, Headspace, and Calm), INCLUDING records of steps, sleep, heart rate, and stress levels, dieting app content, and wellness app content.
 11. All DOCUMENTS RELATING TO any efforts by YOU or others to guide, limit, control, restrict, or monitor YOUR use of DEVICES, DEFENDANTS' platforms, or any other ONLINE MEDIA & COMMUNICATIONS SERVICE.
 12. All DOCUMENTS RELATING TO any information YOU have viewed and/or heard RELATING TO parental controls on DEVICES (INCLUDING any of DEFENDANTS' platforms, other messaging services, other ONLINE MEDIA & COMMUNICATIONS SERVICES, video game applications, or STREAMING SERVICES).
 13. All DOCUMENTS RELATING TO any information YOU viewed, heard, used or have RELATING TO the safety of DEVICES, the safety of any ONLINE MEDIA & COMMUNICATIONS SERVICE, or the alleged effects of any of DEFENDANTS' platforms or screen time on users, INCLUDING any DOCUMENTS RELATING TO the

1 safety of DEFENDANTS' platforms or any statements made by any DEFENDANT on
2 these issues.

- 3 14. All DOCUMENTS RELATING TO any information YOU received, heard, used, or have
4 RELATING TO the alleged effects of screen time on users, INCLUDING any
5 DOCUMENTS RELATING TO any statements made by any DEFENDANT on that issue.
- 6 15. All DOCUMENTS RELATING TO any complaints or reports YOU made to anyone of a
7 negative experience on or using any ONLINE MEDIA & COMMUNICATIONS
8 SERVICE, INCLUDING DEFENDANTS' platforms.
- 9 16. All DOCUMENTS RELATING TO YOUR participation in extracurricular activities or
10 YOUR decision not to participate in extracurricular activities, INCLUDING organized
11 sports, in-school clubs, or out-of-school clubs.
- 12 17. All DOCUMENTS RELATING TO any policy, procedure, statement, curriculum, or
13 syllabus RELATING TO the use of DEVICES or ONLINE MEDIA &
14 COMMUNICATIONS SERVICES at any of YOUR Educational Institution(s) (as defined
15 in Plaintiff Fact Sheet Sections III.H.1-2) or any extracurricular activities, INCLUDING
16 any policies, procedures, statements, curriculums, or syllabuses that call for, prescribe, or
17 otherwise endorse the use of DEVICES or DEFENDANTS' platforms.
- 18 18. All DOCUMENTS RELATING TO any INDIVIDUALIZED EDUCATION PROGRAM
19 or other accommodation for a disability YOU have received in connection with YOUR
20 education.
- 21 19. All DOCUMENTS RELATING TO standardized tests taken by YOU, INCLUDING any
22 DOCUMENTS RELATING TO any accommodations applied for and/or received in
23 connection with the taking of standardized tests.
- 24 20. All DOCUMENTS RELATING TO any volunteering, civic, religious, and/or charitable
25 activities or organizations YOU have participated in, INCLUDING any records of
26 attendance, descriptions of programming, and whether YOU were permitted to use
27 electronic DEVICES at the program or activity.

21. All DOCUMENTS RELATING TO any camps YOU have attended or participated in, INCLUDING any records of attendance, descriptions of programming, and whether YOU were permitted to use electronic DEVICES at the program or activity.
 22. All DOCUMENTS RELATING TO any before- or after-school care YOU have participated in, INCLUDING any records of attendance, descriptions of programming, and whether YOU were permitted to use electronic DEVICES at the program or activity.
 23. All of YOUR yearbooks for all years at all schools YOU attended during the RELEVANT TIME PERIOD.
 24. All DOCUMENTS RELATING TO any bullying incidents involving YOU, INCLUDING bullying via any ONLINE MEDIA & COMMUNICATIONS SERVICE.
 25. All DOCUMENTS RELATING TO any actual or threatened act of terrorism, bomb threat, shooting, violence, or other safety threat at any school while YOU have been or were enrolled.
 26. All DOCUMENTS RELATING TO school closures or remote learning (whether complete or partial) RELATED TO the COVID-19 pandemic, natural disasters, threats, or other safety risks while YOU were enrolled.
 27. All DOCUMENTS RELATING TO any disciplinary action involving YOU at any school YOU have attended during the RELEVANT TIME PERIOD, INCLUDING any expulsion, suspension, detention, investigation, or other action.
 28. All DOCUMENTS RELATING TO YOUR academic performance, INCLUDING disciplinary records, report cards, transcripts, attendance records, or extracurricular participation at any elementary, secondary, post-secondary, or any other school YOU have attended.
 29. All DOCUMENTS RELATING TO YOUR application to or attendance at any Post-Secondary School (as defined in Plaintiff Fact Sheet Section III.H.2).
 30. All DOCUMENTS RELATING to YOUR work history and earnings, INCLUDING whom YOU worked for, dates of employment, salary or wages, work schedule, attendance,

1 recognition, reason(s) for leaving any job, any disciplinary action taken against YOU, and
2 reason(s) for any disciplinary action.

- 3 31. All DOCUMENTS RELATING TO the employment history, annual income, and work
4 schedules for YOUR parent(s), guardian(s), or caretaker(s).
- 5 32. All DOCUMENTS RELATING TO any criminal investigation or proceeding involving
6 YOU or YOUR parent(s), legal guardian(s), HOUSEHOLD members, or caretakers as a
7 suspect, defendant, respondent, victim, complainant, and/or witness, INCLUDING police
8 records, sworn statements, juvenile justice records, criminal justice records, arrest records,
9 court proceedings, transcripts, conviction records, sentencing records, bail records, and
10 supervision records.
- 11 33. All DOCUMENTS RELATING TO any civil court proceedings or investigations involving
12 YOU or YOUR parent(s), legal guardian(s), HOUSEHOLD members, or caretakers,
13 INCLUDING family court, juvenile court, neglect, truancy, divorce, or probate
14 proceedings, and any bankruptcies, foreclosures, repossessions, debt collection, or similar
15 legal actions, INCLUDING any prior sworn testimony by YOU.
- 16 34. All DOCUMENTS RELATING TO any interaction with child protective services, child and
17 family services, foster care, adoption, or any other similar child welfare agency or
18 organization RELATING TO YOU or any current or past members of YOUR
19 HOUSEHOLD.
- 20 35. All DOCUMENTS RELATING TO correspondence with any of YOUR school counselors,
21 teachers, medical health professionals, therapists, law enforcement, social workers, friends,
22 FAMILY, acquaintances, or anyone else RELATING TO YOUR MENTAL HEALTH
23 CONDITION or the allegations in the COMPLAINT or injuries alleged in this LAWSUIT. For
24 the avoidance of doubt, DEFENDANTS expressly do not request copies of any CSAM sent or
25 received. If YOU have materials responsive to this request that are CSAM, please include a list
26 of such materials without providing copies.

- 1 36. All DOCUMENTS RELATING TO statements made by third parties (other than plaintiffs' attorneys) RELATING TO YOUR MENTAL HEALTH CONDITION or the symptoms, side effects, or injuries (INCLUDING physical, mental, psychological, or psychiatric injuries, if any) described in the COMPLAINT or alleged in this LAWSUIT.
- 2 37. All DOCUMENTS RELATING TO any professional recommendation or referral for treatment, or treatment YOU have received for alcohol use or dependence, tobacco use or dependence, drug use or dependence (whether licit or illicit), gaming, gambling, watching television, or any other use disorder, addiction, or dependence.
- 3 38. All billing, insurance, or other DOCUMENTS RELATING TO YOUR medical treatment.
- 4 39. All entries from calendars (INCLUDING electronic calendars), diaries, planners, journals, notes applications (such as Apple Note or Google Keep), datebooks, appointment books, or other DOCUMENTS RELATING TO any injury YOU allege in this LAWSUIT.
- 5 40. All DOCUMENTS RELATING TO any post, comment, email, text message, instant message, note (such as Apple Note or Google Keep) or any other or communication YOU have made INCLUDING on any application or ONLINE MEDIA & COMMUNICATIONS SERVICE where YOU describe YOURSELF as experiencing anxiety, depression, addiction, or any of the physical and mental injuries, illnesses, or conditions listed in Plaintiff Fact Sheet Section VII.A.
- 6 41. All DOCUMENTS RELATING TO any medications, INCLUDING prescription and over-the-counter medications, YOU have taken before or after YOUR alleged injuries in this case.
- 7 42. All of YOUR journals, diaries, daily records, or similar private writings during the RELEVANT TIME PERIOD, INCLUDING notes or writings in connection with any therapy or counseling, whether kept electronically or physically.
- 8 43. All DOCUMENTS, INCLUDING posts, stories, reels, videos, emails, text messages, instant messages, and direct messages made or received by YOU or YOUR parent(s), guardian(s), caretaker(s), or other HOUSEHOLD member(s) RELATING TO: YOUR

- 1 usage of DEVICES or ONLINE MEDIA & COMMUNICATIONS SERVICES; limits on
2 YOUR use of DEVICES or ONLINE MEDIA & COMMUNICATIONS SERVICES; this
3 LAWSUIT; or the facts underlying this LAWSUIT or any claimed injuries.
44. All DOCUMENTS RELATING TO YOUR responses to any portion of YOUR Plaintiff
5 Fact Sheet.
45. All DOCUMENTS RELATING TO communications with or about any DEFENDANT in
7 this LAWSUIT or any ONLINE MEDIA & COMMUNICATIONS SERVICE (excluding
8 court DOCUMENTS filed or served in this case).
46. All DOCUMENTS reflecting any communications between YOU and YOUR counsel in this
10 LAWSUIT prior to any attorney-client relationship.
47. All DOCUMENTS or materials RELATING TO any research YOU or YOUR parent(s),
12 guardian(s), HOUSEHOLD member(s), or other caretaker(s) have done RELATING TO the
13 alleged relationship between DEFENDANTS' platforms and the alleged injuries
14 (INCLUDING mental, psychological, or psychiatric injuries, if any) YOU are claiming in
15 this LAWSUIT.
48. All DOCUMENTS RELATING TO any addiction or other usage of alcohol, tobacco,
17 nicotine, drug, other substance, or gambling by each member of YOUR FAMILY or
18 HOUSEHOLD, or any of YOUR parents, guardians, or caretakers.
49. All DOCUMENTS RELATING TO any other addiction YOU have experienced or any
20 treatment YOU have received for any such addiction.
50. All DOCUMENTS RELATING TO YOUR actual, attempted, or alleged possession,
22 acquisition, distribution, or use of alcohol, tobacco, nicotine, or recreational drugs
23 (INCLUDING marijuana/cannabis/THC, opioids, cocaine, molly/ecstasy, hallucinogens,
24 inhalants, methamphetamines, or prescription drugs used without medical supervision).
51. All DOCUMENTS RELATING TO YOUR transmission or receipt of sexually explicit
26 media. For the avoidance of doubt, DEFENDANTS expressly do not request copies of any
27
28

1 CSAM sent or received. If you have materials responsive to this request that are CSAM,
2 please include a list of such materials without providing copies.

- 3 52. All DOCUMENTS RELATING TO any incident in which YOU were the victim of,
4 accused of, or a witness to discrimination or harassment on the basis of race/ethnicity,
5 national origin, sex, sexual orientation, gender identity, transgender status, or disability,
6 INCLUDING all DOCUMENTS RELATING TO the incident itself, the reporting or
7 investigation of any such incident, documentation of the incident, discussion of the incident,
8 or any injuries resulting from the incident.
- 9 53. All DOCUMENTS RELATING TO any incident in which YOU were the victim of,
10 accused of, or a witness to physical abuse, physical assault, violence, threats of violence or
11 physical neglect, INCLUDING all DOCUMENTS RELATING TO the incident itself, the
12 reporting or investigation of any such incident, documentation of the incident, discussion of
13 the incident, or any injuries resulting from the incident.
- 14 54. All DOCUMENTS RELATING TO any incident in which YOU were involved or alleged
15 to be involved, as a victim of, perpetrator, participant in, or a witness to rape, sexual abuse,
16 sexual assault, sexual harassment, sextortion, sexual grooming, trafficking, or other
17 unwelcome, unconsented, or inappropriate contact, INCLUDING all DOCUMENTS
18 RELATING TO the incident itself, the reporting or investigation of any such incident,
19 documentation of the incident, discussion of the incident, or any injuries resulting from the
20 incident. For the avoidance of doubt, DEFENDANTS expressly do not request copies of
21 any CSAM sent or received. If you have materials responsive to this request that are
22 CSAM, please include a list of such materials without providing copies.
- 23 55. All DOCUMENTS (INCLUDING from sleep-tracking applications or a HEALTHCARE
24 PROFESSIONAL) RELATING TO YOUR sleep during the RELEVANT TIME PERIOD,
25 INCLUDING the amount or quality of YOUR sleep or any symptoms, side effects, or
26 injuries RELATING TO any sleep disorder.

56. All DOCUMENTS RELATING TO any changes in weight, including weight gain or obesity, overeating, undereating, weight loss, and any weight loss routines, weight loss methods, weight loss programs, diets, nutrition programs, and/or weight loss medications or supplements YOU have undertaken or used.
 57. All DOCUMENTS RELATING TO YOUR interactions with any counselor, hotline, and/or the National Eating Disorders Association Helpline RELATING TO an eating disorder, body dysmorphia, compulsive exercise, or similar injury.
 58. All DOCUMENTS RELATING TO YOUR weight, body, or appearance, INCLUDING any changes to YOUR weight, body, or appearance, any efforts or desire to change YOUR weight, body, or appearance; or any commentary on YOUR weight, body, or appearance, in any form INCLUDING e-mails, text messages, instant messages, ONLINE MEDIA & COMMUNICATION SERVICE posts, message board posts, or other posts or communications.
 59. All of YOUR photographs, videos, posts, e-mails, text messages, and instant messages, containing media that has been altered using any appearance-modifying filter or lens.
 60. All DOCUMENTS RELATING TO any attempted suicide, suicidal ideation, or other self-harm by YOU.
 61. All DOCUMENTS INCLUDING communications with any crisis hotlines made by, concerning, or otherwise involving YOU, INCLUDING any such communications with the National Suicide Prevention Hotline or any other suicide hotline.
 62. All DOCUMENTS RELATING TO an attempted suicide, suicidal ideation, death by suicide, or self-harm by any person YOU know.
 63. All DOCUMENTS RELATING TO YOUR physical or mental condition during the time YOU claim YOU were suffering from injuries allegedly caused by DEFENDANTS' platforms; the symptoms, side effects, or injuries (INCLUDING mental, psychological, or psychiatric injuries, if any) described in the COMPLAINT or alleged in this LAWSUIT or

1 YOUR life thereafter INCLUDING photographs, videos, audio recordings, slides, CDs,
2 DVDs, artwork, or any other media.

- 3 64. All DOCUMENTS INCLUDING journals, notebooks, school work, personal essays, creative
4 writing, visual artwork, and music in which YOU discuss topics RELATING TO the
5 allegations in this case, INCLUDING ONLINE MEDIA & COMMUNICATION
6 SERVICES; YOUR physical or mental condition and/or state of mind; the symptoms, side
7 effects, or injuries (INCLUDING mental, psychological, or psychiatric injuries, if any)
8 described in the COMPLAINT or alleged in this LAWSUIT; or YOUR life thereafter.
- 9 65. All DOCUMENTS or materials RELATING TO the relationship between any of
10 DEFENDANTS' platforms and/or any other ONLINE MEDIA & COMMUNICATIONS
11 SERVICE and YOUR symptoms, side effects, or injuries (INCLUDING mental,
12 psychological, or psychiatric injuries, if any) described in the COMPLAINT or alleged in this
13 LAWSUIT, INCLUDING printouts of any websites (INCLUDING attorneys' websites).
- 14 66. All DOCUMENTS RELATING TO any break ups or rejections YOU have experienced
15 with a boyfriend, girlfriend, significant other, other romantic partner, or other individual
16 YOU pursued romantically.
- 17 67. All DOCUMENTS RELATING TO the death of any of YOUR FAMILY members,
18 HOUSEHOLD members, caretakers, friends, teachers, coaches, mentors, spiritual leaders,
19 or pets.
- 20 68. All DOCUMENTS RELATING TO any period of homelessness or displacement,
21 INCLUDING any period in which YOU were living in a vehicle or in a shelter for
22 unhoused or displaced persons or families, or any eviction or threatened eviction
23 experienced by YOU or YOUR FAMILY.
- 24 69. All DOCUMENTS RELATING TO any incident where YOU ran away from home, snuck
25 out of the house, or otherwise stayed overnight somewhere other than YOUR primary
26 residence without permission from YOUR parent(s), guardian(s), or caretaker(s).

- 1 70. All DOCUMENTS RELATING TO any CHALLENGE that YOU have ever accessed,
2 viewed, shared, created, posted about, discussed, participated in, or expressed interest in on
3 any application or ONLINE MEDIA & COMMUNICATIONS SERVICE.
- 4 71. All DOCUMENTS RELATING TO each video, blogpost, website, or ONLINE MEDIA &
5 COMMUNICATION SERVICES post RELATING TO any CHALLENGE that YOU
6 accessed, viewed, shared, created, or posted.
- 7 72. All DOCUMENTS RELATING TO YOUR claim for future or present damages in this
8 LAWsuit, including all DOCUMENTS RELATING TO counseling, medical treatment,
9 hospitalization, tutoring, home care, medications, home modification, or any other damages,
10 all DOCUMENTS RELATING TO the nature and extent of YOUR alleged injuries, and all
11 DOCUMENTS on which each category or computation of alleged damages is based.
- 12 73. All DOCUMENTS RELATING TO the cause of any injuries or damages that YOU allege in
13 this LAWsuit, INCLUDING any DOCUMENTS allegedly linking any alleged injuries to
14 any alleged conduct by any DEFENDANT.
- 15 74. All DOCUMENTS RELATING TO any persons, associations of persons, firms, partnerships,
16 corporations (INCLUDING parent corporations), or any other entities, INCLUDING
17 litigation funders, other than the parties themselves, known by YOU to have either: (i) a
18 financial interest of any kind in the subject matter in controversy or in a party to the
19 proceeding; or (ii) any other kind of interest that could be substantially affected by the
20 outcome of the proceeding. *See* N.D. Cal. L.R. 3-15(b)(2).
- 21 75. All DOCUMENTS RELATING TO worker's compensation, Social Security, or other
22 disability benefits received or requested by YOU, YOUR parent(s), legal guardian(s),
23 caretaker(s), or any member of YOUR HOUSEHOLD RELATING TO YOU.

- 1 76. All DOCUMENTS RELATING TO public financial assistance, INCLUDING Medicare
- 2 received or requested by YOU, YOUR parent(s), legal guardian(s), caretaker(s), or any
- 3 member of YOUR HOUSEHOLD.
- 4 77. All DOCUMENTS, not otherwise privileged, received from, shown to, or produced to any
- 5 expert retained by YOU, INCLUDING any DOCUMENTS reflecting any causation or
- 6 damages models.

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1 Respectfully submitted,

2 Dated: May 1, 2024

3 COVINGTON & BURLING LLP

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26 And TikTok, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2024, a true and correct copy of Defendants' First Requests for Production to Plaintiff Laurel Clevenger, were served upon the following by email:

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EXHIBIT 3

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

Laurel Clevenger

Member Case No. 4:22-cv-06457

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO DEFENDANTS'
REQUESTS FOR PRODUCTION OF
DOCUMENTS, SET ONE**

PROPOUNDING PARTY:

META PLATFORMS, INC., formerly known as Facebook, Inc.; INSTAGRAM, LLC; FACEBOOK PAYMENTS, INC.; SICULUS, INC.; FACEBOOK OPERATIONS, LLC; BYTEDANCE, LTD.; BYTEDANCE, INC.; TIKTOK, LTD.; TIKTOK, LLC; TIKTOK, INC.; and SNAP INC.

RESPONDING PARTIES: Laurel Clevenger

SET: ONE

Plaintiff Laurel Clevenger, by and through her undersigned attorneys, hereby respond to Defendants' requests for production of documents as follows:

PRELIMINARY STATEMENT

Nothing in these responses should be construed as an admission by Plaintiffs with respect to the admissibility or relevance of any fact or document, or of the truth or accuracy of any characterization or statement of any kind contained in Defendants' Requests for Production. Plaintiffs have not completed their investigation of the facts relating to this case, their discovery or their preparation for trial. All responses and objections contained herein are based only upon such information and such documents that are presently available to and specifically known by Plaintiffs. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts and add meaning to known facts, as well as establish entirely

1 new factual conclusions and legal contentions, all of which may lead to substantial additions to,
 2 changes in and variations from the responses set forth herein. The following objections and
 3 responses are made without prejudice to Plaintiffs' right to produce at trial, or elsewhere,
 4 evidence regarding any subsequently discovered documents.

5 Plaintiffs accordingly reserve the right to modify and amend any and all responses herein
 6 as research and discovery are completed and additional contentions are made

GENERAL OBJECTIONS

8 1. Plaintiff objects to the Definitions and Instructions to the extent they attempt to
 9 impose greater or further burdens on Plaintiffs than the Federal Rules of Civil Procedure. Plaintiff
 10 will respond to the requests as required by the applicable rules and in accordance with the
 11 common definitions of the words used in the actual request, subject to the following objections.

12 2. Plaintiff objects to the lack of a relevant time period. With the exception of
 13 Request Nos. 4, 9, 23, 27, 42, and 55, Defendants' requests contain no temporal boundaries. As a
 14 result, the majority of Defendants' requests seek irrelevant and disproportionate information pre-
 15 dating the relevant events. For purposes of these Responses & Objection, Plaintiff defines the
 16 Relevant Time Period as the period beginning on April 23, 2008, and ending on April 1, 2024,
 17 which includes the same start date used in the Plaintiff Fact Sheet.

OBJECTIONS TO DEFINITIONS

19 1. Plaintiff objects to the definition of "FAMILY" as overbroad and unduly
 20 burdensome to the extent that such term includes "caretakers" who are not Plaintiff's legal
 21 guardians. Plaintiff will not search for or produce documents pertaining to any supposed
 22 "caretaker" who is not Plaintiff's parent or official legal guardian. Plaintiff further objects to the
 23 definition of "FAMILY" as overbroad and unduly burdensome to the extent that such term
 24 includes Plaintiff's "aunts, uncles, cousins, grandparents, nieces, and/or nephews." Plaintiff will
 25 not search for or produce documents relating to these individuals.

26 2. Plaintiff objects to the definition of "HOUSEHOLD" as overbroad and unduly
 27 burdensome to the extent that such term includes individuals who "list[Plaintiff's] address as
 28 their permanent address on their driver's license or for tax purposes" but who do not meet any of

1 the other criteria set forth in the definition.

2 **RESPONSES TO REQUESTS FOR PRODUCTION**

3 **REQUEST FOR PRODUCTION NO. 1:**

4 All legal DOCUMENTS RELATING TO any marriage/civil union/partnership YOU or
 5 YOUR parent(s), legal guardian(s), or caretaker(s) have ever had, INCLUDING any
 6 DOCUMENTS RELATING TO divorce, separation, alleged adultery, or alleged domestic abuse.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

8 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 9 In particular, this request seeks all documents “RELATING TO” the “divorce, separation, alleged
 10 adultery, or alleged domestic abuse” for any of Plaintiff’s parents, legal guardians, or caretakers,
 11 without regard to whether such information is relevant to the claims or defenses in this lawsuit.
 12 Plaintiff further objects to this request to the extent it seeks documents that are protected from
 13 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 14 applicable privilege. Plaintiff further objects on the ground that the information sought may
 15 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 16 personal information sought solely for the purpose of harassment and not relevant to the matters
 17 at issue in this litigation. Plaintiff further objects to this request to the extent it seeks documents
 18 that are not within the possession, custody, or control of Plaintiff. Plaintiff further objects to this
 19 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 20 Period.

21 Subject to and without waiving those objections, Plaintiff will produce responsive, non-
 22 privileged documents within her possession consisting of divorce decrees.

23 **REQUEST FOR PRODUCTION NO. 2:**

24 All DOCUMENTS RELATING TO any mental illness suffered by or mental illness
 25 diagnoses of any FAMILY member, INCLUDING the relationship of the FAMILY member to
 26 YOU, the mental illness, any treatment received, and the effect the FAMILY member’s mental
 27 illness has had on YOU.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

2 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
3 Plaintiff further objects on the ground that the information sought may contain sensitive,
4 confidential, and privileged medical, mental health, financial and/or other personal information
5 sought solely for the purpose of harassment and not relevant to the matters at issue in this
6 litigation. To the extent this request seeks documents and information related to Plaintiff's
7 medical and mental health treatment, Plaintiff further objects to this request as duplicative of the
8 documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further objects
9 to this request to the extent it seeks documents that are not within the possession, custody, or
10 control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it seeks
11 documents without limitation to the Relevant Time Period.

12 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
13 responsive documents in accordance with the agreed-to data sources and search terms following
14 the Parties' meet and confer on same.

15 **REQUEST FOR PRODUCTION NO. 3:**

16 All electronic information or data created or maintained by YOUR INTERNET ACCESS
17 PROVIDERS RELATING TO YOUR internet usage or activity. In lieu of obtaining this
18 information YOURSELF, YOU may execute the attached authorization to permit
19 DEFENDANTS to seek from YOUR INTERNET ACCESS PROVIDERS all electronic
20 information or data they have created and/or maintained RELATING TO YOUR internet usage or
21 activity.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

2 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 3 disproportionate to the needs of the case. Plaintiff further objects to this request on the ground
 4 that “YOUR INTERNET ACCESS PROVIDERS” is vague and ambiguous; Plaintiff interprets
 5 this phrase to mean the Internet Access Provider that provides home broadband, DSL, or dial-up
 6 internet service to an account associated with Plaintiff’s household. Plaintiff further objects to this
 7 request as unduly burdensome and overbroad in that it seeks irrelevant internet usage and activity
 8 data about individuals other than Plaintiff. Plaintiff further objects to this request as overbroad
 9 and unduly burdensome because individualized information responsive to this request is not
 10 reasonably available. Plaintiff further objects to this request to the extent it seeks documents that
 11 are not within the possession, custody, or control of Plaintiff. Plaintiff further objects to this
 12 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 13 Period.

14 For these reasons, Plaintiff will not produce documents in response to this request.

15 **REQUEST FOR PRODUCTION NO. 4:**

16 All DOCUMENTS RELATING TO screen time data on all HOUSEHOLD DEVICES
 17 used by YOU during the RELEVANT TIME PERIOD. For example, this can be accessed on an
 18 iPhone by opening the Settings App and selecting “Screen Time.” The response should include:
 19 “All Website and App Activity,” by week, for each week of the RELEVANT TIME PERIOD;
 20 any “App Limits” imposed on each and every DEVICE in YOUR possession; any
 21 “Communication Limits” or “Communication Safety” parameters opted into by any member of
 22 YOUR HOUSEHOLD on each and every one of their DEVICES in YOUR possession; scheduled
 23 “Downtime”; apps that are “Always Allowed”; “Content & Privacy Restrictions”; and “Lock
 24 Screen Time Settings,” as indicated on each and every DEVICE in YOUR possession for the
 25 RELEVANT TIME PERIOD.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

27 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 28 disproportionate to the needs of the case. Plaintiff further objects to this request as overbroad and

1 unduly burdensome because individualized information responsive to this request is not
 2 reasonably available. Plaintiff further objects to this request to the extent it seeks documents that
 3 are not within the possession, custody, or control of Plaintiff.

4 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 5 responsive documents in accordance with the agreed-to data sources and search terms following
 6 the Parties' meet and confer on same.

7 **REQUEST FOR PRODUCTION NO. 5:**

8 DOCUMENTS sufficient to identify all websites, apps, or platforms YOU have used to
 9 access STREAMING SERVICES.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

11 Plaintiff objects to this request as irrelevant to the parties' claims and defenses,
 12 disproportionate to the needs of the case, and intended to harass Plaintiff. In particular, the
 13 websites, apps, or platforms Plaintiff has used to access "STREAMING SERVICES," which
 14 Defendants define to include all forms of media including music and books, are not relevant to
 15 the circumstances described in the complaint or damages sought. Plaintiff further objects to this
 16 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 17 Period.

18 For these reasons, Plaintiff will not produce documents in response to this request.

19 **REQUEST FOR PRODUCTION NO. 6:**

20 All DOCUMENTS RELATING TO YOUR use of STREAMING SERVICES,
 21 INCLUDING DOCUMENTS and any data RELATING TO the duration and frequency of use of
 22 each service, videos watched, times watched, and dates watched since YOU first had regular
 23 access to electronics to April 1, 2024.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

25 Plaintiff objects to this request as irrelevant to the parties' claims and defenses,
 26 disproportionate to the needs of the case, and intended to harass Plaintiff. Plaintiff further objects
 27 to this request as overbroad and unduly burdensome as it seeks documents pertaining to shared
 28 and/or third-party accounts to which Plaintiff may have access but for which individualized

1 information responsive to this request is not reasonably available. Plaintiff further objects to this
 2 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 3 Period.

4 For these reasons, Plaintiff will not produce documents in response to this request.

5 **REQUEST FOR PRODUCTION NO. 7:**

6 DOCUMENTS sufficient to show the names of all video games, as well as the websites,
 7 ONLINE MEDIA & COMMUNICATIONS SERVICES, platforms, game consoles, and systems
 8 YOU have used to play or otherwise engage with video games.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

10 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 11 disproportionate to the needs of the case. Plaintiff further objects to this request as vague and
 12 ambiguous with respect to what “used” and “otherwise engage with” mean; Plaintiff interprets
 13 this request as seeking documents about video games which Plaintiff herself has played. Plaintiff
 14 further objects to this request as duplicative of the Plaintiff Fact Sheet, section IX.D. Plaintiff
 15 further objects to this request as duplicative of Request for Production No. 8. Plaintiff further
 16 objects to this request as overbroad to the extent that it seeks documents without limitation to the
 17 Relevant Time Period.

18 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 19 responsive documents in accordance with the agreed-to data sources and search terms following
 20 the Parties’ meet and confer on same.

21 **REQUEST FOR PRODUCTION NO. 8:**

22 All DOCUMENTS RELATING TO YOUR use of video games, INCLUDING
 23 DOCUMENTS RELATING TO the date, time, duration, frequency, gaming DEVICE, and games
 24 played for every gaming DEVICE YOU used since YOU first had regular access to electronics
 25 (e.g. Xbox, Nintendo, PlayStation, computer, video games accessed on phones, mobile devices,
 26 or tablets) to April 1, 2024.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

2 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 3 disproportionate to the needs of the case. Plaintiff further objects to this request as vague and
 4 ambiguous with respect to what “used” and “otherwise engage with” mean; Plaintiff interprets
 5 this request as seeking documents about video games which Plaintiff herself has played. Plaintiff
 6 further objects to this request as duplicative of the Plaintiff Fact Sheet, section IX.D. Plaintiff
 7 further objects to this request as duplicative of Request for Production No. 7. Plaintiff further
 8 objects to this request as overbroad to the extent that it seeks documents without limitation to the
 9 Relevant Time Period.

10 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 11 responsive documents in accordance with the agreed-to data sources and search terms following
 12 the Parties’ meet and confer on same.

13 **REQUEST FOR PRODUCTION NO. 9:**

14 All DOCUMENTS RELATING TO YOUR Apple App Store or Google Play Store
 15 purchases, downloads, or the removal of ONLINE MEDIA & COMMUNICATIONS SERVICE
 16 from YOUR DEVICES during the RELEVANT TIME PERIOD.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

18 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 19 disproportionate to the needs of the case. In particular, this request seeks documents relating to
 20 the purchase, download, or removal of any “ONLINE MEDIA & COMMUNICATIONS
 21 SERVICE” without respect to whether such website or application is relevant to the claims or
 22 defenses in this lawsuit. Plaintiff further objects to this request as vague and ambiguous with
 23 respect to what “purchases, downloads, or the removal” means.

24 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 25 responsive documents in accordance with the agreed-to data sources and search terms following
 26 the Parties’ meet and confer on same.

REQUEST FOR PRODUCTION NO. 10:

All DOCUMENTS RELATING TO YOUR use of health, dieting, wellness, or fitness applications (INCLUDING BeachBody, My Fitness Pal, NOOM, SWEAT, Peloton, ClassPass, SoulCycle, Barry's, Orange Theory) or trackers (INCLUDING Apple Health, Apple Watch, FitBit, Garmin, My Fitness Pal, Headspace, and Calm), INCLUDING records of steps, sleep, heart rate, and stress levels, dieting app content, and wellness app content.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Plaintiff objects to this request as overbroad, vague, and ambiguous with respect to what “health, dieting, wellness, or fitness application” and “relating to your use” mean. Plaintiff further objects to this request as overbroad in that it seeks all “records of steps, sleep, heart rate, and stress levels, dieting app content, and wellness app content” without regard to whether such information is relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

Subject to these objections and review for relevance, Plaintiff will produce non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties’ meet and confer on same.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS RELATING TO any efforts by YOU or others to guide, limit, control, restrict, or monitor YOUR use of DEVICES, DEFENDANTS’ platforms, or any other ONLINE MEDIA & COMMUNICATIONS SERVICE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Plaintiff objects to this request as overbroad, seeking irrelevant information, and disproportionate to the needs of the case. In particular, this request seeks documents relating to Plaintiff’s use of any “DEVICES” without respect to whether such device is relevant to the claims or defenses in this lawsuit. In addition, this request seeks documents relating to Plaintiff’s use of any “ONLINE MEDIA & COMMUNICATIONS SERVICE” without respect to whether such website or application is relevant to the claims or defenses in this lawsuit. Plaintiff further objects

1 to this request as vague and ambiguous with respect to what “others” means. Plaintiff further
 2 objects to this request as duplicative of the Plaintiff Fact Sheet, section XIII.A.2. Plaintiff further
 3 objects to this request to the extent it seeks documents that are not within the possession, custody,
 4 or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it
 5 seeks documents without limitation to the Relevant Time Period.

6 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 7 responsive documents in accordance with the agreed-to data sources and search terms following
 8 the Parties’ meet and confer on same.

9 **REQUEST FOR PRODUCTION NO. 12:**

10 All DOCUMENTS RELATING TO any information YOU have viewed and/or heard
 11 RELATING TO parental controls on DEVICES (INCLUDING any of DEFENDANTS’
 12 platforms, other messaging services, other ONLINE MEDIA & COMMUNICATIONS
 13 SERVICES, video game applications, or STREAMING SERVICES).

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

15 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 16 disproportionate to the needs of the case. In particular, this request seeks documents relating to
 17 Plaintiff’s use of any “DEVICES” without respect to whether such device is relevant to the claims
 18 or defenses in this lawsuit. In addition, this request seeks documents relating to Plaintiff’s use of
 19 any “ONLINE MEDIA & COMMUNICATIONS SERVICE” without respect to whether such
 20 website or application is relevant to the claims or defenses in this lawsuit. Plaintiff further objects
 21 to this request as vague and ambiguous with respect to what “parental controls on DEVICES”
 22 means. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 23 without limitation to the Relevant Time Period.

24 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 25 responsive documents in accordance with the agreed-to data sources and search terms following
 26 the Parties’ meet and confer on same.

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REQUEST FOR PRODUCTION NO. 13:

All DOCUMENTS RELATING TO any information YOU viewed, heard, used or have RELATING TO the safety of DEVICES, the safety of any ONLINE MEDIA & COMMUNICATIONS SERVICE, or the alleged effects of any of DEFENDANTS' platforms or screen time on users, INCLUDING any DOCUMENTS RELATING TO the safety of DEFENDANTS' platforms or any statements made by any DEFENDANT on these issues.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Plaintiff objects to this request as overbroad, seeking irrelevant information, and disproportionate to the needs of the case. In particular, this request seeks documents relating to Plaintiff's use of any "DEVICES" without respect to whether such device is relevant to the claims or defenses in this lawsuit. In addition, this request seeks documents relating to Plaintiff's use of any "ONLINE MEDIA & COMMUNICATIONS SERVICE" without respect to whether such website or application is relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this request as vague and ambiguous with respect to what "viewed, heard, used or have," "safety," and "alleged effects" mean. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

Subject to these objections and review for relevance, Plaintiff will produce non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 14:

All DOCUMENTS RELATING TO any information YOU received, heard, used, or have RELATING TO the alleged effects of screen time on users, INCLUDING any DOCUMENTS RELATING TO any statements made by any DEFENDANT on that issue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Plaintiff objects to this request as overbroad, seeking irrelevant information, and disproportionate to the needs of the case. Plaintiff further objects to this request as vague and ambiguous with respect to what "viewed, heard, used or have" and "the alleged effects of screen

1 time on users” mean. Plaintiff further objects to this request as overbroad to the extent that it
 2 seeks documents without limitation to the Relevant Time Period.

3 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 4 responsive documents in accordance with the agreed-to data sources and search terms following
 5 the Parties’ meet and confer on same.

6 **REQUEST FOR PRODUCTION NO. 15:**

7 All DOCUMENTS RELATING TO any complaints or reports YOU made to anyone of a
 8 negative experience on or using any ONLINE MEDIA & COMMUNICATIONS SERVICE,
 9 INCLUDING DEFENDANTS’ platforms.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

11 Plaintiff objects to this request as overbroad and seeking irrelevant information. In
 12 particular, this request seeks documents relating to Plaintiff’s experiences with or use of any
 13 “ONLINE MEDIA & COMMUNICATIONS SERVICE” without respect to whether such
 14 website or application is relevant to the claims or defenses in this lawsuit. In addition, this request
 15 seeks documents relating to “complaints or reports” Plaintiff made to “anyone,” which could
 16 include irrelevant communications between Plaintiff and any other individual regarding
 17 Defendants’ platforms. Plaintiff further objects to this request as duplicative of the Plaintiff Fact
 18 Sheet, section XIII.B. Plaintiff further objects to this request as overbroad to the extent that it
 19 seeks documents without limitation to the Relevant Time Period.

20 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 21 responsive documents in accordance with the agreed-to data sources and search terms following
 22 the Parties’ meet and confer on same.

23 **REQUEST FOR PRODUCTION NO. 16:**

24 All DOCUMENTS RELATING TO YOUR participation in extracurricular activities or
 25 YOUR decision not to participate in extracurricular activities, INCLUDING organized sports, in-
 26 school clubs, or out-of-school clubs.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

2 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 3 disproportionate to the needs of the case. Plaintiff further objects to this request as vague,
 4 ambiguous, and overbroad with respect to what “participation” and “decision not to participate”
 5 mean. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 6 without limitation to the Relevant Time Period.

7 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 8 responsive documents in accordance with the agreed-to data sources and search terms following
 9 the Parties’ meet and confer on same.

10 **REQUEST FOR PRODUCTION NO. 17:**

11 All DOCUMENTS RELATING TO any policy, procedure, statement, curriculum, or
 12 syllabus RELATING TO the use of DEVICES or ONLINE MEDIA & COMMUNICATIONS
 13 SERVICES at any of YOUR Educational Institution(s) (as defined in Plaintiff Fact Sheet Sections
 14 III.H.1-2) or any extracurricular activities, INCLUDING any policies, procedures, statements,
 15 curriculums, or syllabuses that call for, prescribe, or otherwise endorse the use of DEVICES or
 16 DEFENDANTS’ platforms.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

18 Plaintiff objects to this request as overbroad and seeking irrelevant information. In
 19 particular, this request seeks documents relating to Plaintiff’s use of any “DEVICES” without
 20 respect to whether such device is relevant to the claims or defenses in this lawsuit. In addition,
 21 this request seeks documents relating to Plaintiff’s use of any “ONLINE MEDIA &
 22 COMMUNICATIONS SERVICE” without respect to whether such website or application is
 23 relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this request as unduly
 24 burdensome in that it seeks information in the possession of third parties. Plaintiff further objects
 25 to this request as duplicative of the Plaintiff Fact Sheet, section III.H. To the extent this request
 26 seeks documents and information related to Plaintiff’s medical and mental health treatment,
 27 Plaintiff further objects to this request as duplicative of the documents Plaintiff will produce as
 28 indicated in the Plaintiff Fact Sheet. Plaintiff further objects to this request to the extent it seeks

1 documents that are not within the possession, custody, or control of Plaintiff. Plaintiff further
 2 objects to this request as overbroad to the extent that it seeks documents without limitation to the
 3 Relevant Time Period.

4 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 5 responsive documents in accordance with the agreed-to data sources and search terms following
 6 the Parties' meet and confer on same.

7 **REQUEST FOR PRODUCTION NO. 18:**

8 All DOCUMENTS RELATING TO any INDIVIDUALIZED EDUCATION PROGRAM
 9 or other accommodation for a disability YOU have received in connection with YOUR education.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

11 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 12 disproportionate to the needs of the case. Plaintiff further objects to this request as unduly
 13 burdensome in that it seeks information in the possession of third parties. Plaintiff further objects
 14 to this request as duplicative of the Plaintiff Fact Sheet, sections III.H and XV.C. Plaintiff further
 15 objects to this request as overbroad to the extent that it seeks documents without limitation to the
 16 Relevant Time Period.

17 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 18 responsive documents in accordance with the agreed-to data sources and search terms following
 19 the Parties' meet and confer on same.

20 **REQUEST FOR PRODUCTION NO. 19:**

21 All DOCUMENTS RELATING TO standardized tests taken by YOU, INCLUDING any
 22 DOCUMENTS RELATING TO any accommodations applied for and/or received in connection
 23 with the taking of standardized tests.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

25 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 26 disproportionate to the needs of the case. Plaintiff further objects to this request as unduly
 27 burdensome in that it seeks information in the possession of third parties. Plaintiff further objects
 28 to this request as duplicative of the Plaintiff Fact Sheet, sections III.H and XV.C. Plaintiff further

1 objects to this request as duplicative of Request for Production No. 18. Plaintiff further objects to
 2 this request as overbroad to the extent that it seeks documents without limitation to the Relevant
 3 Time Period.

4 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 5 responsive documents in accordance with the agreed-to data sources and search terms following
 6 the Parties' meet and confer on same.

7 **REQUEST FOR PRODUCTION NO. 20:**

8 All DOCUMENTS RELATING TO any volunteering, civic, religious, and/or charitable
 9 activities or organizations YOU have participated in, INCLUDING any records of attendance,
 10 descriptions of programming, and whether YOU were permitted to use electronic DEVICES at
 11 the program or activity.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

13 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 14 disproportionate to the needs of the case. In particular, this request seeks documents relating to
 15 Plaintiff's use of any "DEVICES" without respect to whether such device is relevant to the claims
 16 or defenses in this lawsuit. Plaintiff further objects to this request as overbroad to the extent that it
 17 seeks documents without limitation to the Relevant Time Period.

18 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 19 responsive documents in accordance with the agreed-to data sources and search terms following
 20 the Parties' meet and confer on same.

21 **REQUEST FOR PRODUCTION NO. 21:**

22 All DOCUMENTS RELATING TO any camps YOU have attended or participated in,
 23 INCLUDING any records of attendance, descriptions of programming, and whether YOU were
 24 permitted to use electronic DEVICES at the program or activity.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

26 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 27 disproportionate to the needs of the case. In particular, this request seeks documents relating to
 28 Plaintiff's use of any "DEVICES" without respect to whether such device is relevant to the claims

1 or defenses in this lawsuit. Plaintiff further objects to this request to the extent it seeks documents
 2 that are not within the possession, custody, or control of Plaintiff. Plaintiff further objects to this
 3 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 4 Period.

5 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 6 responsive documents in accordance with the agreed-to data sources and search terms following
 7 the Parties' meet and confer on same.

8 **REQUEST FOR PRODUCTION NO. 22:**

9 All DOCUMENTS RELATING TO any before- or after-school care YOU have
 10 participated in, INCLUDING any records of attendance, descriptions of programming, and
 11 whether YOU were permitted to use electronic DEVICES at the program or activity.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

13 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 14 disproportionate to the needs of the case. In particular, this request seeks documents relating to
 15 Plaintiff's use of any "DEVICES" without respect to whether such device is relevant to the claims
 16 or defenses in this lawsuit. Plaintiff further objects to this request to the extent it seeks
 17 documents that are not within the possession, custody, or control of Plaintiff. Plaintiff
 18 further objects to this request as overbroad to the extent that it seeks documents without limitation
 19 to the Relevant Time Period.

20 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 21 responsive documents in accordance with the agreed-to data sources and search terms following
 22 the Parties' meet and confer on same.

23 **REQUEST FOR PRODUCTION NO. 23:**

24 All of YOUR yearbooks for all years at all schools YOU attended during the RELEVANT
 25 TIME PERIOD.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

27 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 28 Plaintiff further objects on the ground that the information sought may contain sensitive and

1 confidential personal information sought solely for the purpose of harassment and not relevant to
 2 the matters at issue in this litigation. Plaintiff further objects to this request as unduly burdensome
 3 in that it seeks information in the possession of third parties. Plaintiff further objects to this
 4 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 5 Period.

6 For these reasons, Plaintiff will not produce documents in response to this request.

7 **REQUEST FOR PRODUCTION NO. 24:**

8 All DOCUMENTS RELATING TO any bullying incidents involving YOU, INCLUDING
 9 bullying via any ONLINE MEDIA & COMMUNICATIONS SERVICE.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

11 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 12 Plaintiff further objects on the ground that the information sought may contain sensitive and
 13 confidential personal information sought solely for the purpose of harassment and not relevant to
 14 the matters at issue in this litigation. Plaintiff further objects to this request as unduly burdensome
 15 in that it seeks information in the possession of third parties. Plaintiff further objects to this
 16 request as unduly burdensome in that it seeks information more readily available to Defendants
 17 than to Plaintiff. Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet,
 18 sections III.H and XV.C. Plaintiff further objects to this request as overbroad to the extent that it
 19 seeks documents without limitation to the Relevant Time Period.

20 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 21 responsive documents in accordance with the agreed-to data sources and search terms following
 22 the Parties' meet and confer on same.

23 **REQUEST FOR PRODUCTION NO. 25:**

24 All DOCUMENTS RELATING TO any actual or threatened act of terrorism, bomb
 25 threat, shooting, violence, or other safety threat at any school while YOU have been or were
 26 enrolled.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

2 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 3 Plaintiff further objects to this request as vague and ambiguous with respect to what “violence”
 4 and “other safety threat” mean. Plaintiff further objects to this request as overbroad and seeking
 5 irrelevant information to the extent it seeks documents relating to any school other than an
 6 educational institution in which Plaintiff was enrolled at the time. Plaintiff further objects to this
 7 request as unduly burdensome in that it seeks information in the possession of third parties.
 8 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, sections III.H and
 9 XV.C. Plaintiff further objects to this request to the extent it seeks documents that are not within
 10 the possession, custody, or control of Plaintiff. Plaintiff further objects to this request as
 11 overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

12 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 13 responsive documents in accordance with the agreed-to data sources and search terms following
 14 the Parties’ meet and confer on same.

15 **REQUEST FOR PRODUCTION NO. 26:**

16 All DOCUMENTS RELATING TO school closures or remote learning (whether
 17 complete or partial) RELATED TO the COVID-19 pandemic, natural disasters, threats, or other
 18 safety risks while YOU were enrolled.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

20 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 21 Plaintiff further objects to this request as overbroad and seeking irrelevant information to the
 22 extent it seeks documents relating to any school other than an educational institution in which
 23 Plaintiff was enrolled at the time. Plaintiff further objects to this request as unduly burdensome in
 24 that it seeks information in the possession of third parties. Plaintiff further objects to this request
 25 as duplicative of the Plaintiff Fact Sheet, sections III.H and XV.C. Plaintiff further objects to this
 26 request to the extent it seeks documents that are not within the possession, custody, or control of
 27 Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 28 without limitation to the Relevant Time Period.

1 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 2 responsive documents in accordance with the agreed-to data sources and search terms following
 3 the Parties' meet and confer on same.

4 **REQUEST FOR PRODUCTION NO. 27:**

5 All DOCUMENTS RELATING TO any disciplinary action involving YOU at any school
 6 YOU have attended during the RELEVANT TIME PERIOD, INCLUDING any expulsion,
 7 suspension, detention, investigation, or other action.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

9 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 10 Plaintiff further objects on the ground that the information sought may contain sensitive and
 11 confidential personal information sought solely for the purpose of harassment and not relevant to
 12 the matters at issue in this litigation. Plaintiff further objects to this request as vague, ambiguous,
 13 and overbroad with respect to what "involving YOU" means." Plaintiff further objects to this
 14 request as unduly burdensome in that it seeks information in the possession of third parties.
 15 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, sections III.H and
 16 XV.C. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 17 without limitation to the Relevant Time Period.

18 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 19 responsive documents in accordance with the agreed-to data sources and search terms following
 20 the Parties' meet and confer on same.

21 **REQUEST FOR PRODUCTION NO. 28:**

22 All DOCUMENTS RELATING TO YOUR academic performance, INCLUDING
 23 disciplinary records, report cards, transcripts, attendance records, or extracurricular participation
 24 at any elementary, secondary, post-secondary, or any other school YOU have attended.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

26 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 27 Plaintiff further objects on the ground that the information sought may contain sensitive and
 28 confidential personal information sought solely for the purpose of harassment and not relevant to

1 the matters at issue in this litigation. Plaintiff further objects to this request as duplicative of the
 2 Plaintiff Fact Sheet, sections III.H and XV.C. Plaintiff further objects to this request as unduly
 3 burdensome in that it seeks information in the possession of third parties. Plaintiff further objects
 4 to this request as duplicative of Requests for Production Nos. 16, 17, 18, 19, 22, 23, 24, 25, 26,
 5 27, 29. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 6 without limitation to the Relevant Time Period.

7 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 8 responsive documents in accordance with the agreed-to data sources and search terms following
 9 the Parties' meet and confer on same.

10 **REQUEST FOR PRODUCTION NO. 29:**

11 All DOCUMENTS RELATING TO YOUR application to or attendance at any Post-
 12 Secondary School (as defined in Plaintiff Fact Sheet Section III.H.2).

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

14 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 15 Plaintiff further objects on the ground that the information sought may contain sensitive and
 16 confidential personal information sought solely for the purpose of harassment and not relevant to
 17 the matters at issue in this litigation. Plaintiff further objects to this request as vague and
 18 ambiguous with respect to what "application to or attendance" means. Plaintiff further objects to
 19 this request as unduly burdensome in that it seeks information in the possession of third parties.
 20 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, sections III.H and
 21 XV.C. Plaintiff further objects to this request as duplicative of Requests for Production Nos. 16,
 22 17, 18, 19, 22, 23, 24, 25, 26, 27, 28. Plaintiff further objects to this request as overbroad to the
 23 extent that it seeks documents without limitation to the Relevant Time Period.

24 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 25 responsive documents in accordance with the agreed-to data sources and search terms following
 26 the Parties' meet and confer on same.

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REQUEST FOR PRODUCTION NO. 30:

All DOCUMENTS RELATING to YOUR work history and earnings, INCLUDING whom YOU worked for, dates of employment, salary or wages, work schedule, attendance, recognition, reason(s) for leaving any job, any disciplinary action taken against YOU, and reason(s) for any disciplinary action.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects on the ground that the information sought may contain sensitive and confidential personal information sought solely for the purpose of harassment and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, sections V, X.A, and XV.B. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

Subject to these objections and review for relevance, Plaintiff will produce non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 31:

All DOCUMENTS RELATING TO the employment history, annual income, and work schedules for YOUR parent(s), guardian(s), or caretaker(s).

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it seeks documents that are not within the possession, custody, or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

For these reasons, Plaintiff will not produce documents in response to this request.

REQUEST FOR PRODUCTION NO. 32:

All DOCUMENTS RELATING TO any criminal investigation or proceeding involving YOU or YOUR parent(s), legal guardian(s), HOUSEHOLD members, or caretakers as a suspect, defendant, respondent, victim, complainant, and/or witness, INCLUDING police records, sworn

1 statements, juvenile justice records, criminal justice records, arrest records, court proceedings,
 2 transcripts, conviction records, sentencing records, bail records, and supervision records.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

4 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 5 Plaintiff further objects to this request as unduly burdensome in that it seeks publicly accessible
 6 information equally available to Defendants. Plaintiff further objects on the ground that the
 7 information sought may contain sensitive, confidential, and privileged medical, mental health,
 8 financial and/or other personal information sought solely for the purpose of harassment and not
 9 relevant to the matters at issue in this litigation. Plaintiff further objects to this request as
 10 overbroad to the extent it seeks documents pertaining to Plaintiff's "HOUSEHOLD members" or
 11 "caretakers" other than her parents, as such documents are not likely to lead to information
 12 relevant to any claims or defenses in this case. Plaintiff further objects to this request as unduly
 13 burdensome to the extent it seeks documents pertaining to Plaintiff or her parents' status as a
 14 "suspect" or "witness" in any criminal investigation or proceeding, as such documents are not
 15 likely to lead to information relevant to any claims or defenses in this case. Plaintiff further
 16 objects to this request to the extent it seeks documents that are not within the possession, custody,
 17 or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it
 18 seeks documents without limitation to the Relevant Time Period.

19 For these reasons, Plaintiff will not produce documents in response to this request.

20 **REQUEST FOR PRODUCTION NO. 33:**

21 All DOCUMENTS RELATING TO any civil court proceedings or investigations
 22 involving YOU or YOUR parent(s), legal guardian(s), HOUSEHOLD members, or caretakers,
 23 INCLUDING family court, juvenile court, neglect, truancy, divorce, or probate proceedings, and
 24 any bankruptcies, foreclosures, repossessions, debt collection, or similar legal actions,
 25 INCLUDING any prior sworn testimony by YOU.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

27 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 28 Plaintiff further objects to this request to the extent it seeks documents that are protected from

1 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 2 applicable privilege. Plaintiff further objects on the ground that the information sought may
 3 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 4 personal information sought solely for the purpose of harassment and not relevant to the matters
 5 at issue in this litigation. Plaintiff further objects to this request as unduly burdensome in that it
 6 seeks publicly accessible information equally available to Defendants. Plaintiff further objects to
 7 this request as unduly burdensome to the extent it seeks documents pertaining to Plaintiff's
 8 "HOUSEHOLD members" or "caretakers" other than her parents, as such documents are not
 9 likely to lead to information relevant to any claims or defenses in this case. Plaintiff further
 10 objects to this request to the extent it seeks documents that are not within the possession, custody,
 11 or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it
 12 seeks documents without limitation to the Relevant Time Period.

13 For these reasons, Plaintiff will not produce documents in response to this request.

14 **REQUEST FOR PRODUCTION NO. 34:**

15 All DOCUMENTS RELATING TO any interaction with child protective services, child
 16 and family services, foster care, adoption, or any other similar child welfare agency or
 17 organization RELATING TO YOU or any current or past members of YOUR HOUSEHOLD.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

19 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 20 Plaintiff further objects to this request to the extent it seeks documents that are protected from
 21 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 22 applicable privilege. Plaintiff further objects on the ground that the information sought may
 23 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 24 personal information sought solely for the purpose of harassment and not relevant to the matters
 25 at issue in this litigation. Plaintiff further objects to this request as vague and ambiguous with
 26 respect to what "interaction" means. Plaintiff further objects to this request to the extent it
 27 seeks documents that are not within the possession, custody, or control of Plaintiff.

1 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 2 limitation to the Relevant Time Period.

3 For these reasons, Plaintiff will not produce documents in response to this request.

4 **REQUEST FOR PRODUCTION NO. 35:**

5 All DOCUMENTS RELATING TO correspondence with any of YOUR school
 6 counselors, teachers, medical health professionals, therapists, law enforcement, social workers,
 7 friends, FAMILY, acquaintances, or anyone else RELATING TO YOUR MENTAL HEALTH
 8 CONDITION or the allegations in the COMPLAINT or injuries alleged in this LAWSUIT. For
 9 the avoidance of doubt, DEFENDANTS expressly do not request copies of any CSAM sent or
 10 received. If YOU have materials responsive to this request that are CSAM, please include a list of
 11 such materials without providing copies.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

13 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 14 Plaintiff further objects to this request to the extent it seeks documents that are protected from
 15 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 16 applicable privilege. Plaintiff further objects on the ground that the information sought may
 17 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 18 personal information sought solely for the purpose of harassment and not relevant to the matters
 19 at issue in this litigation. To the extent this request seeks documents and information related to
 20 Plaintiff's medical and mental health treatment, Plaintiff further objects to this request as
 21 duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet.
 22 Plaintiff further objects to this request as duplicative of Request for Production No. 36. Plaintiff
 23 further objects to this request to the extent it seeks documents that are not within the possession,
 24 custody, or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent
 25 that it seeks documents without limitation to the Relevant Time Period.

26 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 27 responsive documents in accordance with the agreed-to data sources and search terms following
 28 the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 36:

All DOCUMENTS RELATING TO statements made by third parties (other than plaintiffs' attorneys) RELATING TO YOUR MENTAL HEALTH CONDITION or the symptoms, side effects, or injuries (INCLUDING physical, mental, psychological, or psychiatric injuries, if any) described in the COMPLAINT or alleged in this LAWSUIT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it seeks documents that are protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege. Plaintiff further objects on the ground that the information sought may contain sensitive, confidential, and privileged medical, mental health, financial and/or other personal information sought solely for the purpose of harassment and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request as unduly burdensome in that it seeks information in the possession of third parties. To the extent this request seeks documents and information related to Plaintiff's medical and mental health treatment, Plaintiff further objects to this request as duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further objects to this request as duplicative of Request for Production No. 35. Plaintiff further objects to this request to the extent it seeks documents that are not within the possession, custody, or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

Subject to these objections and review for relevance, Plaintiff will produce non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 37:

All DOCUMENTS RELATING TO any professional recommendation or referral for treatment, or treatment YOU have received for alcohol use or dependence, tobacco use or dependence, drug use or dependence (whether licit or illicit), gaming, gambling, watching television, or any other use disorder, addiction, or dependence.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

2 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 3 To the extent this request seeks documents and information related to Plaintiff's medical and
 4 mental health treatment, Plaintiff further objects to this request as duplicative of the documents
 5 Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further objects to this
 6 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 7 Period.

8 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 9 responsive documents in accordance with the agreed-to data sources and search terms following
 10 the Parties' meet and confer on same.

11 **REQUEST FOR PRODUCTION NO. 38:**

12 All billing, insurance, or other DOCUMENTS RELATING TO YOUR medical treatment.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

14 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 15 Plaintiff further objects on the ground that the information sought may contain sensitive,
 16 confidential, and privileged medical, mental health, financial and/or other personal information
 17 sought solely for the purpose of harassment and not relevant to the matters at issue in this
 18 litigation. To the extent this request seeks documents and information related to Plaintiff's
 19 medical and mental health treatment, Plaintiff further objects to this request as duplicative of the
 20 documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further objects
 21 to this request as overbroad to the extent that it seeks documents without limitation to the
 22 Relevant Time Period.

23 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 24 responsive documents in accordance with the agreed-to data sources and search terms following
 25 the Parties' meet and confer on same.

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REQUEST FOR PRODUCTION NO. 39:

All entries from calendars (INCLUDING electronic calendars), diaries, planners, journals, notes applications (such as Apple Note or Google Keep), datebooks, appointment books, or other DOCUMENTS RELATING TO any injury YOU allege in this LAWSUIT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it seeks documents that are protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege. Plaintiff further objects on the ground that the information sought may contain sensitive, confidential, and privileged medical, mental health, financial and/or other personal information sought solely for the purpose of harassment and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request to the extent it seeks documents that are not within the possession, custody, or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

Subject to these objections and review for relevance, Plaintiff will produce non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 40:

All DOCUMENTS RELATING TO any post, comment, email, text message, instant message, note (such as Apple Note or Google Keep) or any other communication YOU have made INCLUDING on any application or ONLINE MEDIA & COMMUNICATIONS SERVICE where YOU describe YOURSELF as experiencing anxiety, depression, addiction, or any of the physical and mental injuries, illnesses, or conditions listed in Plaintiff Fact Sheet Section VII.A.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it seeks documents that are protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or any other

1 applicable privilege. Plaintiff further objects on the ground that the information sought may
 2 contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 3 personal information sought solely for the purpose of harassment and not relevant to the matters
 4 at issue in this litigation. Plaintiff further objects to this request as overbroad to the extent that it
 5 seeks documents without limitation to the Relevant Time Period.

6 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 7 responsive documents in accordance with the agreed-to data sources and search terms following
 8 the Parties' meet and confer on same.

9 **REQUEST FOR PRODUCTION NO. 41:**

10 All DOCUMENTS RELATING TO any medications, INCLUDING prescription and
 11 over-the-counter medications, YOU have taken before or after YOUR alleged injuries in this
 12 case.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

14 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 15 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, section VI.C.
 16 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 17 limitation to the Relevant Time Period.

18 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 19 responsive documents in accordance with the agreed-to data sources and search terms following
 20 the Parties' meet and confer on same.

21 **REQUEST FOR PRODUCTION NO. 42:**

22 All of YOUR journals, diaries, daily records, or similar private writings during the
 23 RELEVANT TIME PERIOD, INCLUDING notes or writings in connection with any therapy or
 24 counseling, whether kept electronically or physically.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

26 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 27 Plaintiff further objects to this request to the extent it seeks documents that are protected from
 28 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other

1 applicable privilege. Plaintiff further objects to this request as unduly burdensome and not
 2 reasonably calculated to lead to information relevant to any claims or defenses in this case to the
 3 extent it seeks documents that do not discuss Plaintiff's alleged injuries or Defendants' conduct
 4 including Plaintiff's use of Defendants' platforms. Plaintiffs object to this request as duplicative
 5 of Request for Production No. 39.

6 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 7 responsive documents in accordance with the agreed-to data sources and search terms following
 8 the Parties' meet and confer on same.

9 **REQUEST FOR PRODUCTION NO. 43:**

10 All DOCUMENTS, INCLUDING posts, stories, reels, videos, emails, text messages,
 11 instant messages, and direct messages made or received by YOU or YOUR parent(s), guardian(s),
 12 caretaker(s), or other HOUSEHOLD member(s) RELATING TO: YOUR usage of DEVICES or
 13 ONLINE MEDIA & COMMUNICATIONS SERVICES; limits on YOUR use of DEVICES or
 14 ONLINE MEDIA & COMMUNICATIONS SERVICES; this LAWSUIT; or the facts underlying
 15 this LAWSUIT or any claimed injuries.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

17 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 18 In particular, this request seeks documents relating to Plaintiff's use of any "DEVICES" without
 19 respect to whether such device is relevant to the claims or defenses in this lawsuit. In addition,
 20 this request seeks documents relating to Plaintiff's use of any "ONLINE MEDIA &
 21 COMMUNICATIONS SERVICE" without respect to whether such website or application is
 22 relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this request to the
 23 extent it seeks documents that are protected from disclosure by the attorney-client privilege, the
 24 attorney work product doctrine, or any other applicable privilege. Plaintiff further objects to this
 25 request to the extent it seeks documents that are not within the possession, custody, or control of
 26 Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 27 without limitation to the Relevant Time Period.

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1 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 2 responsive documents in accordance with the agreed-to data sources and search terms following
 3 the Parties' meet and confer on same.

4 **REQUEST FOR PRODUCTION NO. 44:**

5 All DOCUMENTS RELATING TO YOUR responses to any portion of YOUR Plaintiff
 6 Fact Sheet.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

8 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 9 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet. Plaintiff further
 10 objects to this request as unduly burdensome in that it seeks information more readily available to
 11 Defendants than to Plaintiff. Plaintiff further objects to this request to the extent it seeks
 12 documents that are protected from disclosure by the attorney-client privilege, the attorney work
 13 product doctrine, or any other applicable privilege. Plaintiff further objects to this request as
 14 overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

15 Subject to these objections, Plaintiff refers Defendants to the Plaintiff Fact Sheet and
 16 accompanying documents.

17 **REQUEST FOR PRODUCTION NO. 45:**

18 All DOCUMENTS RELATING TO communications with or about any DEFENDANT in
 19 this LAWSUIT or any ONLINE MEDIA & COMMUNICATIONS SERVICE (excluding court
 20 DOCUMENTS filed or served in this case).

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

22 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 23 In particular, this request seeks documents relating to Plaintiff's use of any "ONLINE MEDIA &
 24 COMMUNICATIONS SERVICE" without respect to whether such website or application is
 25 relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this request to the
 26 extent it seeks documents that are protected from disclosure by the attorney-client privilege, the
 27 attorney work product doctrine, or any other applicable privilege. Plaintiff further objects to this
 28 request as unduly burdensome in that it seeks information more readily available to Defendants

1 than to Plaintiff. Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet,
 2 section XIII.B. Plaintiff further objects to this request as duplicative of Request for Production
 3 No. 15. Plaintiff further objects to this request to the extent it seeks documents that are not within
 4 the possession, custody, or control of Plaintiff. Plaintiff further objects to this request as
 5 overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

6 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 7 responsive documents in accordance with the agreed-to data sources and search terms following
 8 the Parties' meet and confer on same.

9 **REQUEST FOR PRODUCTION NO. 46:**

10 All DOCUMENTS reflecting any communications between YOU and YOUR counsel in
 11 this LAWSUIT prior to any attorney-client relationship.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

13 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 14 Plaintiff further objects to this request to the extent it seeks documents that are protected from
 15 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 16 applicable privilege. Plaintiff further objects to this request as overbroad to the extent that it seeks
 17 documents without limitation to the Relevant Time Period.

18 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 19 responsive documents in accordance with the agreed-to data sources and search terms following
 20 the Parties' meet and confer on same.

21 **REQUEST FOR PRODUCTION NO. 47:**

22 All DOCUMENTS or materials RELATING TO any research YOU or YOUR parent(s),
 23 guardian(s), HOUSEHOLD member(s), or other caretaker(s) have done RELATING TO the
 24 alleged relationship between DEFENDANTS' platforms and the alleged injuries (INCLUDING
 25 mental, psychological, or psychiatric injuries, if any) YOU are claiming in this LAWSUIT.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

27 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 28 Plaintiff further objects to this request to the extent it seeks documents that are protected from

1 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 2 applicable privilege. Plaintiff further objects to this request to the extent it seeks documents that
 3 are not within the possession, custody, or control of Plaintiff. Plaintiff further objects to this
 4 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 5 Period.

6 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 7 responsive documents in accordance with the agreed-to data sources and search terms following
 8 the Parties' meet and confer on same.

9 **REQUEST FOR PRODUCTION NO. 48:**

10 All DOCUMENTS RELATING TO any addiction or other usage of alcohol, tobacco,
 11 nicotine, drug, other substance, or gambling by each member of YOUR FAMILY or
 12 HOUSEHOLD, or any of YOUR parents, guardians, or caretakers.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

14 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 15 Plaintiff further objects to this request as vague and ambiguous with respect to what "other usage"
 16 and "other substance" mean. To the extent this request seeks documents and information related
 17 to Plaintiff's medical and mental health treatment, Plaintiff further objects to this request as
 18 duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet.
 19 Plaintiff further objects to this request to the extent it seeks documents that are not within the
 20 possession, custody, or control of Plaintiff. Plaintiff further objects to this request as overbroad to
 21 the extent that it seeks documents without limitation to the Relevant Time Period.

22 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 23 responsive documents in accordance with the agreed-to data sources and search terms following
 24 the Parties' meet and confer on same.

25 **REQUEST FOR PRODUCTION NO. 49:**

26 All DOCUMENTS RELATING TO any other addiction YOU have experienced or any
 27 treatment YOU have received for any such addiction.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, sections IX.F. To the extent this request seeks documents and information related to Plaintiff's medical and mental health treatment, Plaintiff further objects to this request as duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

Subject to these objections and review for relevance, Plaintiff will produce non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 50:

All DOCUMENTS RELATING TO YOUR actual, attempted, or alleged possession, acquisition, distribution, or use of alcohol, tobacco, nicotine, or recreational drugs (INCLUDING marijuana/cannabis/THC, opioids, cocaine, molly/ecstasy, hallucinogens, inhalants, methamphetamines, or prescription drugs used without medical supervision).

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Plaintiff objects to this request as overbroad, seeking irrelevant information, and disproportionate to the needs of the case. Plaintiff further objects on the ground that the information sought may contain sensitive, confidential, and privileged medical, mental health, financial and/or other personal information sought solely for the purpose of harassment and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request to the extent it seeks information subject to Fifth Amendment protection. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

For these reasons, Plaintiff will not produce documents in response to this request.

REQUEST FOR PRODUCTION NO. 51:

All DOCUMENTS RELATING TO YOUR transmission or receipt of sexually explicit media. For the avoidance of doubt, DEFENDANTS expressly do not request copies of any

1 CSAM sent or received. If you have materials responsive to this request that are CSAM, please
 2 include a list of such materials without providing copies.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

4 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 5 disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it
 6 seeks documents that are protected from disclosure by the attorney-client privilege, the attorney
 7 work product doctrine, or any other applicable privilege. Plaintiff further objects on the ground
 8 that the information sought may contain sensitive, confidential, and privileged medical, mental
 9 health, financial and/or other personal information sought solely for the purpose of harassment
 10 and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request as
 11 unduly burdensome in that it seeks information in the possession of third parties. Plaintiff further
 12 objects to this request to the extent it seeks information subject to Fifth Amendment protection.
 13 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 14 limitation to the Relevant Time Period.

15 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 16 responsive documents in accordance with the agreed-to data sources and search terms following
 17 the Parties' meet and confer on same.

18 **REQUEST FOR PRODUCTION NO. 52:**

19 All DOCUMENTS RELATING TO any incident in which YOU were the victim of,
 20 accused of, or a witness to discrimination or harassment on the basis of race/ethnicity, national
 21 origin, sex, sexual orientation, gender identity, transgender status, or disability, INCLUDING all
 22 DOCUMENTS RELATING TO the incident itself, the reporting or investigation of any such
 23 incident, documentation of the incident, discussion of the incident, or any injuries resulting from
 24 the incident.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 52:**

26 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 27 disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it
 28 seeks documents that are protected from disclosure by the attorney-client privilege, the attorney

1 work product doctrine, or any other applicable privilege. Plaintiff further objects on the ground
 2 that the information sought may contain sensitive, confidential, and privileged medical, mental
 3 health, financial and/or other personal information sought solely for the purpose of harassment
 4 and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request to
 5 the extent it seeks information subject to Fifth Amendment protection. Plaintiff further objects to
 6 this request as unduly burdensome in that it seeks information in the possession of third parties.
 7 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, section IV.
 8 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 9 limitation to the Relevant Time Period.

10 For these reasons, Plaintiff will not produce documents in response to this request.

11 **REQUEST FOR PRODUCTION NO. 53:**

12 All DOCUMENTS RELATING TO any incident in which YOU were the victim of,
 13 accused of, or a witness to physical abuse, physical assault, violence, threats of violence or
 14 physical neglect, INCLUDING all DOCUMENTS RELATING TO the incident itself, the
 15 reporting or investigation of any such incident, documentation of the incident, discussion of the
 16 incident, or any injuries resulting from the incident.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

18 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 19 disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it
 20 seeks documents that are protected from disclosure by the attorney-client privilege, the attorney
 21 work product doctrine, or any other applicable privilege. Plaintiff further objects on the ground
 22 that the information sought may contain sensitive, confidential, and privileged medical, mental
 23 health, financial and/or other personal information sought solely for the purpose of harassment
 24 and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request to
 25 the extent it seeks information subject to Fifth Amendment protection. Plaintiff further objects to
 26 this request as unduly burdensome in that it seeks information in the possession of third parties.
 27 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, section IV.

1 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 2 limitation to the Relevant Time Period.

3 For these reasons, Plaintiff will not produce documents in response to this request.

4 **REQUEST FOR PRODUCTION NO. 54:**

5 All DOCUMENTS RELATING TO any incident in which YOU were involved or alleged
 6 to be involved, as a victim of, perpetrator, participant in, or a witness to rape, sexual abuse, sexual
 7 assault, sexual harassment, sextortion, sexual grooming, trafficking, or other unwelcome,
 8 unconsented, or inappropriate contact, INCLUDING all DOCUMENTS RELATING TO the
 9 incident itself, the reporting or investigation of any such incident, documentation of the incident,
 10 discussion of the incident, or any injuries resulting from the incident. For the avoidance of doubt,
 11 DEFENDANTS expressly do not request copies of any CSAM sent or received. If you have
 12 materials responsive to this request that are CSAM, please include a list of such materials without
 13 providing copies.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

15 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 16 disproportionate to the needs of the case. Plaintiff further objects to this request to the extent it
 17 seeks documents that are protected from disclosure by the attorney-client privilege, the attorney
 18 work product doctrine, or any other applicable privilege. Plaintiff further objects on the ground
 19 that the information sought may contain sensitive, confidential, and privileged medical, mental
 20 health, financial and/or other personal information sought solely for the purpose of harassment
 21 and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request to
 22 the extent it seeks information subject to Fifth Amendment protection. Plaintiff further objects to
 23 this request as unduly burdensome in that it seeks information in the possession of third parties.
 24 Plaintiff further objects to this request as duplicative of the Plaintiff Fact Sheet, section IV.
 25 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 26 limitation to the Relevant Time Period.

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1 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 2 responsive documents in accordance with the agreed-to data sources and search terms following
 3 the Parties' meet and confer on same.

4 **REQUEST FOR PRODUCTION NO. 55:**

5 All DOCUMENTS (INCLUDING from sleep-tracking applications or a HEALTHCARE
 6 PROFESSIONAL) RELATING TO YOUR sleep during the RELEVANT TIME PERIOD,
 7 INCLUDING the amount or quality of YOUR sleep or any symptoms, side effects, or injuries
 8 RELATING TO any sleep disorder.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

10 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 11 disproportionate to the needs of the case. To the extent this request seeks documents and
 12 information related to Plaintiff's medical and mental health treatment, Plaintiff further objects to
 13 this request as duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact
 14 Sheet. Plaintiff further objects to this request as duplicative of Request for Production No. 10.
 15 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 16 limitation to the Relevant Time Period.

17 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 18 responsive documents in accordance with the agreed-to data sources and search terms following
 19 the Parties' meet and confer on same.

20 **REQUEST FOR PRODUCTION NO. 56:**

21 All DOCUMENTS RELATING TO any changes in weight, including weight gain or
 22 obesity, overeating, undereating, weight loss, and any weight loss routines, weight loss methods,
 23 weight loss programs, diets, nutrition programs, and/or weight loss medications or supplements
 24 YOU have undertaken or used.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

26 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 27 To the extent this request seeks documents and information related to Plaintiff's medical and
 28 mental health treatment, Plaintiff further objects to this request as duplicative of the documents

1 Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further objects to this
 2 request as duplicative of Request for Production No. 58. Plaintiff further objects to this request as
 3 overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

4 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 5 responsive documents in accordance with the agreed-to data sources and search terms following
 6 the Parties' meet and confer on same.

7 **REQUEST FOR PRODUCTION NO. 57:**

8 All DOCUMENTS RELATING TO YOUR interactions with any counselor, hotline,
 9 and/or the National Eating Disorders Association Helpline RELATING TO an eating disorder,
 10 body dysmorphia, compulsive exercise, or similar injury.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

12 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 13 Plaintiff further objects on the ground that the information sought may contain sensitive,
 14 confidential, and privileged medical, mental health, financial and/or other personal information
 15 sought solely for the purpose of harassment and not relevant to the matters at issue in this
 16 litigation. Plaintiff further objects to this request as unduly burdensome in that it seeks
 17 information in the possession of third parties. Plaintiff further objects to this request as overbroad
 18 to the extent that it seeks documents without limitation to the Relevant Time Period.

19 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 20 responsive documents in accordance with the agreed-to data sources and search terms following
 21 the Parties' meet and confer on same.

22 **REQUEST FOR PRODUCTION NO. 58:**

23 All DOCUMENTS RELATING TO YOUR weight, body, or appearance, INCLUDING
 24 any changes to YOUR weight, body, or appearance, any efforts or desire to change YOUR
 25 weight, body, or appearance; or any commentary on YOUR weight, body, or appearance, in any
 26 form INCLUDING e-mails, text messages, instant messages, ONLINE MEDIA &
 27 COMMUNICATION SERVICE posts, message board posts, or other posts or communications.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

2 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 3 Plaintiff further objects to this request as unduly burdensome in that it seeks information in the
 4 possession of third parties. Plaintiff further objects to this request as unduly burdensome in that it
 5 seeks information more readily available to Defendants than to Plaintiff. Plaintiff further objects
 6 to this request as duplicative of Request for Production No. 56. Plaintiff further objects to this
 7 request as overbroad to the extent that it seeks documents without limitation to the Relevant Time
 8 Period.

9 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 10 responsive documents in accordance with the agreed-to data sources and search terms following
 11 the Parties' meet and confer on same.

12 **REQUEST FOR PRODUCTION NO. 59:**

13 All of YOUR photographs, videos, posts, e-mails, text messages, and instant messages,
 14 containing media that has been altered using any appearance-modifying filter or lens.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

16 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 17 Plaintiff further objects to this request as unduly burdensome to the extent it requires Plaintiff to
 18 ascertain whether any media responsive to this request was altered using an appearance-
 19 modifying filter or lens; Plaintiff interprets this request as seeking photographs, videos, posts, e-
 20 mails, text messages, and instant messages that Plaintiff sent containing media that Plaintiff
 21 knows has been altered using an appearance-modifying filter or lens. Plaintiff further objects to
 22 this request as overbroad to the extent that it seeks documents without limitation to the Relevant
 23 Time Period.

24 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 25 responsive documents in accordance with the agreed-to data sources and search terms following
 26 the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 60:

All DOCUMENTS RELATING TO any attempted suicide, suicidal ideation, or other self-harm by YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects on the ground that the information sought may contain sensitive, confidential, and privileged medical, mental health, financial and/or other personal information sought solely for the purpose of harassment and not relevant to the matters at issue in this litigation. To the extent this request seeks documents and information related to Plaintiff's medical and mental health treatment, Plaintiff further objects to this request as duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further objects to this request as overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

Subject to these objections and review for relevance, Plaintiff will produce non-privileged responsive documents in accordance with the agreed-to data sources and search terms following the Parties' meet and confer on same.

REQUEST FOR PRODUCTION NO. 61:

All DOCUMENTS INCLUDING communications with any crisis hotlines made by, concerning, or otherwise involving YOU, INCLUDING any such communications with the National Suicide Prevention Hotline or any other suicide hotline.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Plaintiff objects to this request as overbroad and disproportionate to the needs of the case. Plaintiff further objects on the ground that the information sought may contain sensitive, confidential, and privileged medical, mental health, financial and/or other personal information sought solely for the purpose of harassment and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request as unduly burdensome in that it seeks information in the possession of third parties. Plaintiff further objects to this request to the extent it seeks documents that are not within the possession, custody, or control of Plaintiff. Plaintiff

1 further objects to this request as overbroad to the extent that it seeks documents without limitation
 2 to the Relevant Time Period.

3 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 4 responsive documents in accordance with the agreed-to data sources and search terms following
 5 the Parties' meet and confer on same.

6 **REQUEST FOR PRODUCTION NO. 62:**

7 All DOCUMENTS RELATING TO an attempted suicide, suicidal ideation, death by
 8 suicide, or self-harm by any person YOU know.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

10 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 11 disproportionate to the needs of the case. Plaintiff further objects to this request as unduly
 12 burdensome in that it seeks information in the possession of third parties. Plaintiff further objects
 13 on the ground that the information sought may contain sensitive, confidential, and privileged
 14 medical, mental health, financial and/or other personal information sought solely for the purpose
 15 of harassment and not relevant to the matters at issue in this litigation. Plaintiff further objects to
 16 this request to the extent it seeks documents that are not within the possession, custody, or control
 17 of Plaintiff. Plaintiff further objects to this request as overbroad to the extent that it seeks
 18 documents without limitation to the Relevant Time Period.

19 For these reasons, Plaintiff will not produce documents in response to this request.

20 **REQUEST FOR PRODUCTION NO. 63:**

21 All DOCUMENTS RELATING TO YOUR physical or mental condition during the time
 22 YOU claim YOU were suffering from injuries allegedly caused by DEFENDANTS' platforms;
 23 the symptoms, side effects, or injuries (INCLUDING mental, psychological, or psychiatric
 24 injuries, if any) described in the COMPLAINT or alleged in this LAWSUIT or YOUR life
 25 thereafter INCLUDING photographs, videos, audio recordings, slides, CDs, DVDs, artwork, or
 26 any other media.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

2 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 3 Plaintiff further objects on the ground that the information sought may contain sensitive,
 4 confidential, and privileged medical, mental health, financial and/or other personal information
 5 sought solely for the purpose of harassment and not relevant to the matters at issue in this
 6 litigation. Plaintiff further objects to this request as unduly burdensome in that it seeks
 7 information in the possession of third parties. To the extent this request seeks documents and
 8 information related to Plaintiff's medical and mental health treatment, Plaintiff further objects to
 9 this request as duplicative of the documents Plaintiff will produce as indicated in the Plaintiff Fact
 10 Sheet. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 11 without limitation to the Relevant Time Period.

12 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 13 responsive documents in accordance with the agreed-to data sources and search terms following
 14 the Parties' meet and confer on same.

15 **REQUEST FOR PRODUCTION NO. 64:**

16 All DOCUMENTS INCLUDING journals, notebooks, school work, personal essays,
 17 creative writing, visual artwork, and music in which YOU discuss topics RELATING TO the
 18 allegations in this case, INCLUDING ONLINE MEDIA & COMMUNICATION SERVICES;
 19 YOUR physical or mental condition and/or state of mind; the symptoms, side effects, or injuries
 20 (INCLUDING mental, psychological, or psychiatric injuries, if any) described in the
 21 COMPLAINT or alleged in this LAWSUIT; or YOUR life thereafter.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 64:**

23 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 24 In particular, this request seeks documents relating to Plaintiff's use of any "ONLINE MEDIA &
 25 COMMUNICATIONS SERVICE" without respect to whether such website or application is
 26 relevant to the claims or defenses in this lawsuit. Plaintiff further objects on the ground that the
 27 information sought may contain sensitive, confidential, and privileged medical, mental health,
 28 financial and/or other personal information sought solely for the purpose of harassment and not

1 relevant to the matters at issue in this litigation. Plaintiff further objects to this request as vague
 2 and ambiguous with respect to “life thereafter” means. Plaintiff further objects to this request as
 3 unduly burdensome in that it seeks information in the possession of third parties. Plaintiff further
 4 objects to this request as overbroad to the extent that it seeks documents without limitation to the
 5 Relevant Time Period.

6 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 7 responsive documents in accordance with the agreed-to data sources and search terms following
 8 the Parties’ meet and confer on same.

9 **REQUEST FOR PRODUCTION NO. 65:**

10 All DOCUMENTS or materials RELATING TO the relationship between any of
 11 DEFENDANTS’ platforms and/or any other ONLINE MEDIA & COMMUNICATIONS
 12 SERVICE and YOUR symptoms, side effects, or injuries (INCLUDING mental, psychological,
 13 or psychiatric injuries, if any) described in the COMPLAINT or alleged in this LAWSUIT,
 14 INCLUDING printouts of any websites (INCLUDING attorneys’ websites).

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 65:**

16 Plaintiff objects to this request as overbroad and disproportionate to the needs of the case.
 17 In particular, this request seeks documents relating to Plaintiff’s use of any “ONLINE MEDIA &
 18 COMMUNICATIONS SERVICE” without respect to whether such website or application is
 19 relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this request to the
 20 extent it seeks documents that are protected from disclosure by the attorney-client privilege, the
 21 attorney work product doctrine, or any other applicable privilege. Plaintiff further objects to this
 22 request to the extent it calls for premature production of expert analysis, opinions, or testimony.
 23 Plaintiff will provide expert materials in accordance with the case schedule and any applicable
 24 expert disclosure obligations under Rule 26(a)(2). Plaintiff further objects to this request to the
 25 extent it seeks documents that are not within the possession, custody, or control of Plaintiff.
 26 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 27 limitation to the Relevant Time Period.

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1 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 2 responsive documents in accordance with the agreed-to data sources and search terms following
 3 the Parties' meet and confer on same.

4 **REQUEST FOR PRODUCTION NO. 66:**

5 All DOCUMENTS RELATING TO any break ups or rejections YOU have experienced
 6 with a boyfriend, girlfriend, significant other, other romantic partner, or other individual YOU
 7 pursued romantically.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 66:**

9 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 10 disproportionate to the needs of the case. Plaintiff further objects on the ground that the
 11 information sought may contain sensitive, confidential, and privileged medical, mental health,
 12 financial and/or other personal information sought solely for the purpose of harassment and not
 13 relevant to the matters at issue in this litigation. Plaintiff further objects to this request as unduly
 14 burdensome in that it seeks information in the possession of third parties. Plaintiff further objects
 15 to this request as overbroad to the extent that it seeks documents without limitation to the
 16 Relevant Time Period.

17 For these reasons, Plaintiff will not produce documents in response to this request.

18 **REQUEST FOR PRODUCTION NO. 67:**

19 All DOCUMENTS RELATING TO the death of any of YOUR FAMILY members,
 20 HOUSEHOLD members, caretakers, friends, teachers, coaches, mentors, spiritual leaders, or
 21 pets.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 67:**

23 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 24 disproportionate to the needs of the case. Plaintiff further objects on the ground that the
 25 information sought may contain sensitive, confidential, and privileged medical, mental health,
 26 financial and/or other personal information sought solely for the purpose of harassment and not
 27 relevant to the matters at issue in this litigation. Plaintiff further objects to this request as unduly
 28 burdensome in that it seeks information in the possession of third parties. Plaintiff further

1 objects to this request to the extent it seeks documents that are not within the possession,
 2 custody, or control of Plaintiff. Plaintiff further objects to this request as overbroad to the extent
 3 that it seeks documents without limitation to the Relevant Time Period.

4 For these reasons, Plaintiff will not produce documents in response to this request.

5 **REQUEST FOR PRODUCTION NO. 68:**

6 All DOCUMENTS RELATING TO any period of homelessness or displacement,
 7 INCLUDING any period in which YOU were living in a vehicle or in a shelter for unhoused or
 8 displaced persons or families, or any eviction or threatened eviction experienced by YOU or
 9 YOUR FAMILY.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 68:**

11 Plaintiff objects to this request as overbroad, seeking irrelevant information, and
 12 disproportionate to the needs of the case. Plaintiff further objects on the ground that the
 13 information sought may contain sensitive, confidential, and privileged medical, mental health,
 14 financial and/or other personal information sought solely for the purpose of harassment and not
 15 relevant to the matters at issue in this litigation. Plaintiff further objects to this request to the
 16 extent it seeks documents that are not within the possession, custody, or control of Plaintiff.
 17 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 18 limitation to the Relevant Time Period.

19 For these reasons, Plaintiff will not produce documents in response to this request.

20 **REQUEST FOR PRODUCTION NO. 69:**

21 All DOCUMENTS RELATING TO any incident where YOU ran away from home, snuck
 22 out of the house, or otherwise stayed overnight somewhere other than YOUR primary residence
 23 without permission from YOUR parent(s), guardian(s), or caretaker(s).

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 69:**

25 Plaintiff objects to this request as overbroad, seeking irrelevant information,
 26 disproportionate to the needs of the case, and cumulative. Plaintiff further objects on the ground
 27 that the information sought may contain sensitive, confidential, and privileged medical, mental
 28 health, financial and/or other personal information sought solely for the purpose of harassment

1 and not relevant to the matters at issue in this litigation. Plaintiff further objects to this request as
 2 overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

3 For these reasons, Plaintiff will not produce documents in response to this request.

4 **REQUEST FOR PRODUCTION NO. 70:**

5 All DOCUMENTS RELATING TO any CHALLENGE that YOU have ever accessed,
 6 viewed, shared, created, posted about, discussed, participated in, or expressed interest in on any
 7 application or ONLINE MEDIA & COMMUNICATIONS SERVICE.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 70:**

9 Plaintiff objects to this request as overbroad, disproportionate to the needs of the case, and
 10 cumulative. In particular, this request seeks documents relating to Plaintiff's use of any "ONLINE
 11 MEDIA & COMMUNICATIONS SERVICE" without respect to whether such website or
 12 application is relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this
 13 request as vague and ambiguous with respect to what "accessed, viewed, shared, created, posted
 14 about, discussed, participated in, or expressed interest" means; Plaintiff interprets this phrase as
 15 referring to CHALLENGES with which Plaintiff engaged in a public post or reaction. Plaintiff
 16 further objects to this request as unduly burdensome in that it seeks information more readily
 17 available to Defendants than to Plaintiff. Plaintiff further objects to this request as duplicative of
 18 Request for Production No. 71. Plaintiff further objects to this request as overbroad to the extent
 19 that it seeks documents without limitation to the Relevant Time Period.

20 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 21 responsive documents in accordance with the agreed-to data sources and search terms following
 22 the Parties' meet and confer on same.

23 **REQUEST FOR PRODUCTION NO. 71:**

24 All DOCUMENTS RELATING TO each video, blogpost, website, or ONLINE MEDIA
 25 & COMMUNICATION SERVICES post RELATING TO any CHALLENGE that YOU
 26 accessed, viewed, shared, created, or posted.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 71:**

2 Plaintiff objects to this request as overbroad, disproportionate to the needs of the case, and
 3 cumulative. In particular, this request seeks documents relating to Plaintiff's use of any "ONLINE
 4 MEDIA & COMMUNICATIONS SERVICE" without respect to whether such website or
 5 application is relevant to the claims or defenses in this lawsuit. Plaintiff further objects to this
 6 request as unduly burdensome in that it seeks information more readily available to Defendants
 7 than to Plaintiff. Plaintiff further objects to this request as duplicative of Request for Production
 8 No. 70. Plaintiff further objects to this request as overbroad to the extent that it seeks documents
 9 without limitation to the Relevant Time Period.

10 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 11 responsive documents in accordance with the agreed-to data sources and search terms following
 12 the Parties' meet and confer on same.

13 **REQUEST FOR PRODUCTION NO. 72:**

14 All DOCUMENTS RELATING TO YOUR claim for future or present damages in this
 15 LAWSUIT, including all DOCUMENTS RELATING TO counseling, medical treatment,
 16 hospitalization, tutoring, home care, medications, home modification, or any other damages, all
 17 DOCUMENTS RELATING TO the nature and extent of YOUR alleged injuries, and all
 18 DOCUMENTS on which each category or computation of alleged damages is based.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 72:**

20 Plaintiff objects to this request to the extent it seeks documents that are protected from
 21 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 22 applicable privilege. Plaintiff further objects to this request to the extent it calls for premature
 23 production of expert analysis, opinions, or testimony. Plaintiff will provide expert materials in
 24 accordance with the case schedule and any applicable expert disclosure obligations under Rule
 25 26(a)(2). Plaintiff further objects to this request as unduly burdensome in that it seeks information
 26 in the possession of third parties. Plaintiff further objects to this request as premature in that
 27 requests for production may not be used to require Plaintiff to marshal all available proof or all
 28 proof Plaintiff intends to offer at trial. Plaintiff further objects to this request as duplicative of the

1 documents that Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further
 2 objects on the ground that the information sought may contain sensitive, confidential, and
 3 privileged medical, mental health, financial and/or other personal information sought solely for
 4 the purpose of harassment and not relevant to the matters at issue in this litigation. Plaintiff
 5 further objects to this request as overbroad to the extent that it seeks documents without limitation
 6 to the Relevant Time Period.

7 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 8 responsive documents in accordance with the agreed-to data sources and search terms following
 9 the Parties' meet and confer on same.

10 **REQUEST FOR PRODUCTION NO. 73:**

11 All DOCUMENTS RELATING TO the cause of any injuries or damages that YOU allege
 12 in this LAWSUIT, INCLUDING any DOCUMENTS allegedly linking any alleged injuries to any
 13 alleged conduct by any DEFENDANT.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 73:**

15 Plaintiff objects to this request to the extent it seeks documents that are protected from
 16 disclosure by the attorney-client privilege, the attorney work product doctrine, or any other
 17 applicable privilege. Plaintiff further objects to this request to the extent it calls for premature
 18 production of expert analysis, opinions, or testimony. Plaintiff will provide expert materials in
 19 accordance with the case schedule and any applicable expert disclosure obligations under Rule
 20 26(a)(2). Plaintiff further objects to this request as unduly burdensome in that it seeks information
 21 in the possession of third parties. Plaintiff further objects to this request as premature in that
 22 requests for production may not be used to require Plaintiff to marshal all available proof or all
 23 proof Plaintiff intends to offer at trial. Plaintiff further objects to this request as duplicative of the
 24 documents that Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff further
 25 objects on the ground that the information sought may contain sensitive, confidential, and
 26 privileged medical, mental health, financial and/or other personal information sought solely for
 27 the purpose of harassment and not relevant to the matters at issue in this litigation. Plaintiff
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1 further objects to this request as overbroad to the extent that it seeks documents without limitation
 2 to the Relevant Time Period.

3 Subject to these objections and review for relevance, Plaintiff will produce non-privileged
 4 responsive documents in accordance with the agreed-to data sources and search terms following
 5 the Parties' meet and confer on same.

6 **REQUEST FOR PRODUCTION NO. 74:**

7 All DOCUMENTS RELATING TO any persons, associations of persons, firms,
 8 partnerships, corporations (INCLUDING parent corporations), or any other entities,
 9 INCLUDING litigation funders, other than the parties themselves, known by YOU to have either:
 10 (i) a financial interest of any kind in the subject matter in controversy or in a party to the
 11 proceeding; or (ii) any other kind of interest that could be substantially affected by the outcome of
 12 the proceeding. See N.D. Cal. L.R. 3-15(b)(2).

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 74:**

14 Plaintiff objects to this request as overbroad, disproportionate to the needs of the case, and
 15 cumulative. Plaintiff further objects to this request to the extent it seeks documents that are
 16 protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or
 17 any other applicable privilege. Plaintiff further objects on the ground that the information sought
 18 may contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 19 personal information sought solely for the purpose of harassment and not relevant to the matters
 20 at issue in this litigation. Plaintiff further objects to this request as unduly burdensome in that it
 21 seeks information in the possession of third parties. Plaintiff further objects to this request as
 22 overbroad to the extent that it seeks documents without limitation to the Relevant Time Period.

23 Subject to these objections, Plaintiff is not in possession, custody, or control of such
 24 documents.

25 **REQUEST FOR PRODUCTION NO. 75:**

26 All DOCUMENTS RELATING TO worker's compensation, Social Security, or other
 27 disability benefits received or requested by YOU, YOUR parent(s), legal guardian(s),
 28 caretaker(s), or any member of YOUR HOUSEHOLD RELATING TO YOU.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 75:**

2 Plaintiff objects to this request as overbroad, disproportionate to the needs of the case, and
 3 cumulative. Plaintiff further objects to this request to the extent it seeks documents that are
 4 protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or
 5 any other applicable privilege. Plaintiff further objects on the ground that the information sought
 6 may contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 7 personal information sought solely for the purpose of harassment and not relevant to the matters
 8 at issue in this litigation. Plaintiff further objects to this request as unduly burdensome in that it
 9 seeks information in the possession of third parties. Plaintiff further objects to this request to the extent
 10 it seeks documents that are not within the possession, custody, or control of Plaintiff.
 11 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 12 limitation to the Relevant Time Period.

13 For these reasons, Plaintiff will not produce documents in response to this request.

14 **REQUEST FOR PRODUCTION NO. 76:**

15 All DOCUMENTS RELATING TO public financial assistance, INCLUDING Medicare
 16 received or requested by YOU, YOUR parent(s), legal guardian(s), caretaker(s), or any member
 17 of YOUR HOUSEHOLD.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 76:**

19 Plaintiff objects to this request as overbroad, disproportionate to the needs of the case, and
 20 cumulative. Plaintiff further objects to this request to the extent it seeks documents that are
 21 protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or
 22 any other applicable privilege. Plaintiff further objects on the ground that the information sought
 23 may contain sensitive, confidential, and privileged medical, mental health, financial and/or other
 24 personal information sought solely for the purpose of harassment and not relevant to the matters
 25 at issue in this litigation. Plaintiff further objects to this request as unduly burdensome in that it
 26 seeks information in the possession of third parties. Plaintiff further objects to this request to the extent
 27 it seeks documents that are not within the possession, custody, or control of Plaintiff.

1 Plaintiff further objects to this request as overbroad to the extent that it seeks documents without
 2 limitation to the Relevant Time Period.

3 For these reasons, Plaintiff will not produce documents in response to this request.

4 **REQUEST FOR PRODUCTION NO. 77:**

5 All DOCUMENTS, not otherwise privileged, received from, shown to, or produced to any
 6 expert retained by YOU, INCLUDING any DOCUMENTS reflecting any causation or damages
 7 models.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

9 Plaintiff objects to this request as overbroad, disproportionate to the needs of the case, and
 10 cumulative. Plaintiff further objects to this request to the extent it seeks documents that are
 11 protected from disclosure by the attorney-client privilege, the attorney work product doctrine, or
 12 any other applicable privilege. Plaintiff further objects to this request to the extent it calls for
 13 premature production of expert analysis, opinions, or testimony. Plaintiff will provide expert
 14 materials in accordance with the case schedule and any applicable expert disclosure obligations
 15 under Rule 26(a)(2). Plaintiff further objects to this request as unduly burdensome in that it seeks
 16 information in the possession of third parties. Plaintiff further objects to this request as premature
 17 in that requests for production may not be used to require Plaintiff to marshal all available proof
 18 or all proof Plaintiff intends to offer at trial. Plaintiff further objects to this request as duplicative
 19 of the documents that Plaintiff will produce as indicated in the Plaintiff Fact Sheet. Plaintiff
 20 further objects to this request as overbroad to the extent that it seeks documents without limitation
 21 to the Relevant Time Period.

22 Plaintiffs anticipate submitting expert reports on or before the date for expert disclosures
 23 per the Court's scheduling order.

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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that a copy of the foregoing was served via electronic mail
3 on May 31, 2024, to Counsel for Defendants META PLATFORMS, INC., *formerly known as*
4 Facebook, Inc.; INSTAGRAM, LLC; FACEBOOK PAYMENTS, INC.; SICULUS, INC.;
5 FACEBOOK OPERATIONS, LLC; BYTEDANCE, LTD.; BYTEDANCE, INC.; TIKTOK, LTD.;
6 TIKTOK, LLC; TIKTOK, INC.; and SNAP INC.:
7

8 MetaNoticeofService@cov.com

9 SnapNoticeofService@mto.com

10 TikTokNoticeofService@faegredrinker.com

12 */s/ Joseph G. VanZandt*
13 Joseph G. VanZandt